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REC'D TN  
REGULATORY AUTH.

01 FEB 15 PM 2 08  
February 15, 2004

OFFICE OF THE  
EXECUTIVE SECRETARY

Guy M. Hicks  
General Counsel

615 214 6301  
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VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Third Party Testing of BellSouth OSS*  
Docket No. 99-00347

Dear Mr. Waddell:

Enclosed please find fourteen copies of the following documents which have been filed with the Georgia Public Service Commission ("GPSC").

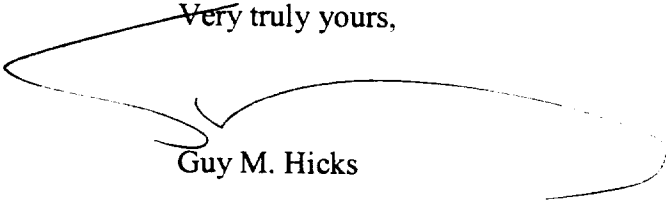
<u>Date Filed</u>	<u>Description of Document(s)</u>
01/16/01	KPMG Exceptions 120, 122, 123 and 124; 2 <sup>nd</sup> Amended Exception 79; and 4 <sup>th</sup> Amended Exception 76; BellSouth Response to Exceptions 120, 122, 123 and 124; Amended Response to Exceptions 95, 115, and 119; 2 <sup>nd</sup> Amended Response to Exception 47; 3 <sup>rd</sup> Amended Response to Exception 113.
01/16/01	KPMG <i>Transaction Response Timeliness Evaluation Methodology</i> document
01/26/01	KPMG Interim Status Report
02/02/01	KPMG Revised Interim Status Report (from 1/26/01)
02/02/01	KPMG Exceptions 121, 125, 126, 127 and 128; BellSouth Response to Exceptions 121, 125, 126, 127, Amended Response to Exceptions 112 and 127; 2 <sup>nd</sup> Amended Response to Exception 77; 3 <sup>rd</sup> Amended Response to Exception 76; 4 <sup>th</sup> Amended Response to Exception 113; 5 <sup>th</sup> Amended Response to Exceptions 71 and 78; Exception 128 Statement of

David Waddell, Executive Secretary  
February 15, 2001  
Page 2

<u>Date Filed</u>	<u>Description of Document(s)</u>
	Investigation; Closure Reports for Exceptions 8, 31, 81 (Addendum), 105 and 107.

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch

## CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2001, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

☐ Hand  
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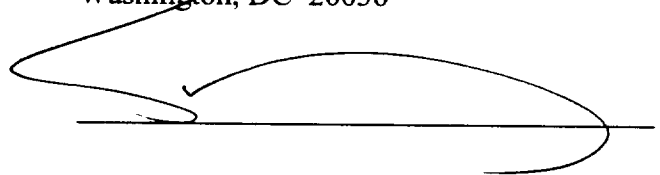
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**RECEIVED**

JAN 16 2001

EXECUTIVE SECRETARY  
G.P.S.C.

January 16, 2001

Ms. Helen O'Leary  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street  
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U**

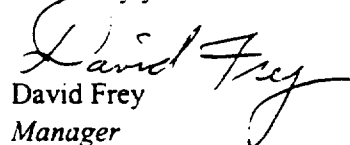
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 76 (4<sup>th</sup> Amended) and Exception 79 (2<sup>nd</sup> Amended), Exception 120, Exception 122, Exception 123 and Exception 124. Please also find enclosed the following responses from BellSouth: Exception 47 BLS 2<sup>nd</sup> Amended Response; Exception 95 BLS Amended Response; Exception 113 BLS 3<sup>rd</sup> Amended Response; Exception 115 BLS Amended Response; Exception 119 BLS Amended Response; Exception 120 Response; Exception 122 BLS Response; Exception 123 BLS Response; and Exception 124 BLS Response.

We request that these documents be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

  
David Frey  
Manager

Enclosures

cc: Parties of Record



## EXCEPTION 76 (Fourth Amended)

### BellSouth Georgia OSS Testing Evaluation

Date: January 10, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Evaluation Retest.

#### Exception:

**KPMG Consulting LLC (KCL) encountered BellSouth Switch Translations and directory listings provisioning errors for UNE-P orders.**

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to switch translation data and the directory listing database.

Of the 89 switch translations for lines that were validated, 16 lines (18.0%) contained information inconsistent with the corresponding LSRs. Of the 16 lines, one (6.3%) was flow-through and 15 (93.7%) were non-flow through.

Of the 55 directory listing orders, 34 were provisioned incorrectly, resulting in a 61.8% failure rate. Of the 34 orders, five (14.7%) listings were not listed in the database while 29 (85.3%) orders were listed incorrectly.

The following tables provide the specific data.

SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
409R223PEM101001	(912) 755-9434	9990	No ESX	AA	Y
415R213PTM001002	(706) 303-9662	9990	Not working	AA	N
415R213PTM001002	(706) 303-2317	9990	Not working	AA	N
415R213PTM001002	(706) 303-2318	9990	Not working	AA	N
415R213PTM001002	(706) 303-2319	9990	Not working	AA	N
605R214PTJ000001	(706) 722-9484	9994	Wrong PIC & LPIC	AA	N
605R214PTJ000001	(706) 722-9194	9994	Wrong PIC,	AA	N
625R214PTJ000002	(912) 746-4538	9990	Wrong PIC & LPIC,	AB	N

## EXCEPTION 76 (Fourth Amended)

### BellSouth Georgia OSS Testing Evaluation

SWITCH TRANSLATION VERIFICATION					
PON	TN	OCN	Switch Translations Discrepancy	VER	F/T
625R214PTJ000002	(912) 746-5245	9990	Wrong PIC & LPIC.	AB	N
625R214PTJ000002	(912) 746-6152	9990	Wrong PIC & LPIC.	AB	N
625R214PTJ000003	(706) 774-1688	9990	Wrong PIC & LPIC	AB	N
625R214PTJ000003	(706) 774-6550	9990	Wrong PIC	AB	N
625R214PTJ000003	(706) 774-9891	9990	Wrong PIC	AB	N
625R214PTJ000005	(912) 746-0461	9990	Should not have NSQ	AA	N
625R214PTJ000005	(912) 746-1330	9990	Should not have NSQ	AA	N
625R214PTJ000005	(912) 746-7343	9990	Should not have NSQ	AA	N

DIRECTORY LISTINGS VERIFICATION						
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER
301R112PEF000009	N	9991	(706) 434-0845	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PEF100011	Y	9991	(706) 434-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PEF101020	Y	9991	(706) 434-0851	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PTF002001	N	9994	(706) 434-0806	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
305R112PTF100012	Y	9994	(912) 314-0807	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	1
305R112PTF100013	N	9994	(404) 214-0684	Number is listed as "non-published" and "listed number". Should only be LN.	UNE-Analog Loop	2
307R122PEF001009	N	9994	(404) 214-0685	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
307R122PEF001010	N	9994	(912) 314-0809	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	0

# EXCEPTION 76 (Fourth Amended)

BellSouth Georgia OSS Testing Evaluation

DIRECTORY LISTINGS VERIFICATION						
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER
307R122PEF001011	N	9994	(912) 314-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
307R122PTF000008	N	9991	(706) 434-0810	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	0
307R222PTF000005	N	9991	(706) 434-0811	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0
307R222PTF000006	N	9991	(912) 314-0810	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	1
319R122PEF101023	Y	9994	(706) 434-0849	Should be listed as Rwh but listed as RWH.	DL	2
319R122PTF000017	N	9994	(706) 434-0848	Should be listed as Rwh but listed as RWH.	DL	0
319R122PTF000018	N	9994	(478) 314-0821	Should be listed as Rwh but listed as RWH.	DL	1
328R312PTI000002	N	9991	(912) 742-0979	Should be listed as Rwh but listed as RWH.	LLNP	0
330R222PEI000004	N	7727	(706) 722-8897	No listing found, but should be listed as LN.	LLNP	0
350R112PTI000002	N	7727	(706) 722-4544	Should be listed as RWH but listed as R W H.	LLNP	0
383R215PEG000004	N	7727	(706) 722-1321	No listing found, but should be listed as NP.	LNP	0
383R215PEG000006	N	7727	(912) 742-6976	No listing found, but should be listed as NP.	LNP	0
395R213PEM100002	Y	9994	(912) 746-6208	Should be listed as Rwh but listed as RWH.	Port Order	0
395R213PTM100001	Y	9994	(706) 828-6865	Should be listed as Rwh but listed as RWH.	Port Order	0
422R114PEJ100003	Y	9994	(404) 929-6480	Should be listed as Rwh but listed as RWH.	LPC	1
422R114PEJ101001	Y	9994	(706) 303-2412	Should be listed as Rwh but listed as RWH.	LPC	0
423R114PEJ101002	Y	9994	(912) 742-7604	Should be listed as Rwh but listed as RWH.	LPC	0
423R114PTJ100003	Y	9994	(404) 417-0398	Should be listed as Rwh but listed as RWH.	LPC	0
423R114PTJ101001	Y	9994	(706) 722-4464	Should be listed as Rwh but listed as RWH.	LPC	0
435R114PEJ001003	N	9990	(478) 742-3853	Should be listed as Rwh but listed as RWH.	LPC	0
452R216PTF000002	N	9990	(706) 774-9339	No listing found but should be listed as AL.	DL	0
605R214PEJ000002	N	9994	(912) 742-6359	No listing found but should be listed as LN.	LPC	0

## EXCEPTION 76 (Fourth Amended)

### BellSouth Georgia OSS Testing Evaluation

DIRECTORY LISTINGS VERIFICATION						
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	VER
605R214PTJ000003	N	9994	(404) 417-0464	Wrong TN information was brought up on the screen.	LPC	0
606R123PEM000003	N	9990	(404) 321-4748	Should be listed as Rwh but listed as R W H.	Port Order	0
606R123PTM000004	N	9990	(912) 742-9886	Should be listed as Rwh but listed as R W H.	Port Order	0
606R123PTM001002	N	9990	(706) 724-0819	Should be listed as Rwh Enterprises but listed as Georgia R W H.	LPC	0

#### Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations—customers not receiving features that were ordered
- Directory Listing - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.



## EXCEPTION 79 (Second Amended)

BellSouth Georgia OSS Testing Evaluation

Date: January 11, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the Data Collection and Storage Verification and Validation Review (PMR-1).

#### Exception:

**BellSouth does not have an adequate data retention policy for its early-stage data<sup>1</sup>, the programs used to process the early-stage data, the raw data used in the calculation of the Service Quality Measurement (SQM) reports, or the computation programs used to calculate SQM report values.**

#### Initial Exception:

**BellSouth does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP).<sup>2</sup>**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the state of Georgia.

Through interviews, KPMG Consulting LLC (KCL) has learned that BellSouth does not adequately retain some of the source data used in the calculation of manual SQMs. The following table shows the data in question and the associated storage duration.

Source Data System	SQM Affected	Retention Duration
Meridian Max	<i>Speed of Answer in the Ordering Center (Ordering)</i>	8 days
Renaissance Enterprise Management	<i>Interface Availability (OSS)</i>	Current month

<sup>1</sup> Early-stage data is the earliest instance of the data collected in the BellSouth OSS.

<sup>2</sup> These SQMs are referred to as "manual SQMs."

# **EXCEPTION 79 (Second Amended)** **BellSouth Georgia OSS Testing Evaluation**

Source Data System	SQM Affected	Retention Duration
Spectrum Automatic Call Distributor	<i>Average Speed of Answer in Ordering Centers – Residence (Ordering)</i>	60 days
Meridian Symposium	<i>Average Answer Time in Repair Centers for Large Business (Maintenance &amp; Repair)</i>	2 days
Meridian Max	<i>Average Answer Time in Repair Centers – Residence (Maintenance &amp; Repair)</i>	7 days
QMS	<i>Average Speed to Answer - Toll (Operator Services Toll &amp; Directory Assistance)</i>	45 days

## **Amendment:**

On further investigation, KCL learned that BellSouth does not have a written policy regarding retention of any early-stage data, the computer programs used to process the early-stage data, the raw data, or the SQM-generating computer programs for an adequate time period.

In KCL's professional opinion, to facilitate a thorough audit of BellSouth's Metrics data in the future, BellSouth should retain the early-stage data, the computer programs used to process the early-stage data, the raw data and the computer programs used to create the SQM reports (along with the reports themselves) for a period of three years after the publishing of an SQM report. Retention of all of these elements is essential for a complete and accurate audit of BellSouth's SQMs.

## **Second Amendment:**

In December 2000, KCL met with the Georgia Public Service Commission (GPSC) and BellSouth to further discuss the issue of an appropriate data retention interval. KCL articulated its professional opinion that retaining the relevant data for an 18-month time period could be sufficient if periodic audits of appropriate data were conducted.

KCL suggests that BellSouth continue to formalize its data retention policies with the guidance of the GPSC. Additional discussions will be held between KCL, BellSouth and the GPSC on this issue.

**Impact:**

Inadequate retention of data and the associated computer programs limits the ability of BellSouth or other parties to validate or re-generate historical SQM reports that may need to be revised, corrected, or audited.

## EXCEPTION 120

### BellSouth Georgia OSS Testing Evaluation

Date: December 13, 2000

### EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning service quality measurements (SQMs).

#### Exception:

**BellSouth-reported raw data files used in the calculation of three ordering metrics for the KCL Test CLEC incorrectly report certain purchase order numbers and version numbers as non-mechanized orders in August and September 2000.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission (GPSC), BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL compared the data that BellSouth uses to produce SQM reports for the KCL Test CLEC with the corresponding data that KCL collects using its own test management tools. KCL looked at the purchase order numbers and the version numbers in the raw data reported by BellSouth in PMAP for the Test CLEC for August and September 2000. It found that certain Purchase Order Numbers (PONs) and Version Numbers (VERs) were listed as NON-MECHANIZED orders. Table 1 lists a sample of such PONs and VERs from the raw data file "Ordering Service Orders".

***Table 1—PONs & VERs listed as NON-MECHANIZED***

PON	VERSION	MONTH
303R222PEH000001		August
307R122PTH000001		August
315R212PTH000001		August
318R112PEH000001		August
320R212PEH000001		August
395R213PTM100001	0	August
398R213PTM000001		August
399R213PEM100001	1	August
432R214PEJ000001		August
435R114PEJ000001		August

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

## EXCEPTION 120

### BellSouth Georgia OSS Testing Evaluation

PON	VERSION	MONTH
452R216PEF000001	1	August
511R212PEH000001	0	August
602R214PEJ100001	0	August
605R214PTJ000001		August
609R214PEJ000001	0	August
625R214PTJ000002	0	August
R013B21PTN000010		August
301R112PTF100005		September
301R112PTF101005	3	September
301R112PTH000002	0	September
301R112PTH000003	2	September
302R312PTH000001	2	September
302R312PTH001001	0	September
303R222PEF000001	0	September
303R222PEF100005	1	September
303R222PEH000002		September
303R222PEH002001		September
303R222PTF000003	1	September
303R222PTH000003	1	September
305R112PEF100010	0	September
305R112PEH000002		September
305R112PEH000005		September
305R112PEH000006	0	September
305R112PTH000007		September
305R112PTH000008		September
305R122PEH000005	6	September
305R222PTH000004		September
307R122PEF000003		September
307R122PEF000009	0	September
307R122PEF000010	0	September
307R122PEF000011	0	September
307R122PEH000003	2	September
307R122PEH000004		September
307R122PEH000005	0	September
307R122PTH000002	0	September
307R122PTH001001		September
307R122PTH003001		September
307R222PTF000006	0	September
307R222PTF00006	0	September
307R222PTH000003	1	September
307R222PTH100002	1	September
315R212PEH000002	0	September
315R212PEH000003	0	September
315R212PEH000004	1	September
315R212PTH000005	0	September
315R212PTH001001	2	September
317R122PEH000002	0	September
317R122PEH000004	0	September

## EXCEPTION 120

### BellSouth Georgia OSS Testing Evaluation

PON	VERSION	MONTH
317R122PTH000001	1	September
317R122PTH000003	0	September
318R112PEF000002	O2	September
318R112PEH000004	0	September
318R112PEH000005	0	September
318R112PEH001001		September
318R112PTH000003	O	September
318R112PTH100006		September
320R212PTH000002	0	September
324R112PEH000001	1	September
324R112PTH000002	0	September
3-7R122PEH000004	-	September
395R213PEM100002	O	September
395R213PTM100003	O	September
398R213PEM000002		September
398R213PTM000003		September
399R213PEM000003		September
399R213PTM100002		September
404R223PEM100003	1	September
404R223PTM100002	0	September
409R223PEM100003	1	September
409R223PTM100002	O	September
409R223PTM100004		September
409R223PTM101002	0	September
414R223PEM000001	O	September
414R223PEM000002	1	September
414R223PTM000003	O	September
415R213PEM000003	O	September
415R213PEM000004	0	September
415R213PTM000002	0	September
415R213PTM001002		September
419R223PEM100001		September
419R223PEM101001		September
419R223PTM100002	O	September
419R223PTM100003	O	September
419R223PTM100004	0	September
419R223PTM100005	O	September
432R214PEJ000003		September
432R214PTJ000002	O	September
435R114PEJ000003		September
440R124PTJ000001	O	September
440R1W4PTJ000002		September
441R214PEJ000002	0	September
441R214PTJ000003		September
511R212PEH001001	1	September
511R212PTH000003	0	September
511R212PTH000004	0	September
602R214PEJ100003	O	September

## EXCEPTION 120

BellSouth Georgia OSS Testing Evaluation

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PON	VERSION	MONTH
605R214PEJ000002	0	September
605R214PTJ000003		September
606R123PTM000002	0	September
606R123PTM000004	0	September
606R123PTM001002		September
615R122PEH000002		September
625R214PEJ000008	0	September
625R214PTJ000003		September
625R214PTJ000006	0	September

### Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

Date: January 5, 2001

**EXCEPTION REPORT**

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

**Exception:**

**Definitions and Business Rules in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* are incomplete or inaccurate for the Firm Order Confirmation (FOC) Timeliness and Reject Interval Ordering Service Quality Measurements.**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the state of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting, LLC (KCL) is reviewing the *SQM Reports*.<sup>2</sup> KCL is evaluating the accuracy and completeness of each metric's stated definition, calculation, and business rules, as well as the consistency between these items.

KCL observed the following.

**1. Ordering – FOC Timeliness**

Examples of the business rules listed in *SQM Reports* for Fully Mechanized and Partially Mechanized are as follows:

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<sup>1</sup> These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") web site.

<sup>2</sup> KCL used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCL also took into consideration changes published over time in more recent versions of the *SQM Reports*. The Business Rules listed in this Exception are listed in the *SQM Reports* published at the end of November 2000.



## EXCEPTION 122

### BellSouth Georgia OSS Testing Evaluation

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- **“Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC.”
- **“Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC.”

BellSouth has recently informed KCL that it records the LEO time stamp for both the incoming and outgoing timestamps for purposes of SQM reporting, which would seemingly contradict the Commission-approved SQM definitions, based on our professional judgment. For inbound LSRs the definition is very clear, specifying use of the specific interface timestamps. The outbound timestamp to be used based on the definition is less clear. However, KCL, based on its professional judgment, interprets the point at which an FOC is “returned to the CLEC” to be the point at which the BellSouth interface gateway transmits the FOC to the CLEC interface. At the time at which an FOC is sent from LEO to the BellSouth interface gateway (the measurement point recorded per BellSouth’s current practice), the FOC has not yet been returned to the CLEC, but has been transmitted from one BellSouth system to another.

## 2. Ordering – Reject Interval

The business rules listed in *SQM Reports* for Fully Mechanized and Partially Mechanized, as examples, are as follows:

- **“Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in LEO). Auto Clarifications are considered in the Fully Mechanized category.”
- **“Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LEO.”

BellSouth has recently informed KCL that it records the LEO time stamp for both the incoming and outgoing timestamps for purposes of SQM reporting, which would seemingly contradict the stated SQM definitions based on our professional judgment.

**EXCEPTION 122**BellSouth Georgia OSS Testing Evaluation

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**Impact:**

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Accurate and complete definitions and business rules are essential to the CLECs' ability to interpret the performance measurement properly and conduct these functions reliably.

Date: December 18, 2000

## **EXCEPTION REPORT**

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

### **Exception:**

**KPMG Consulting LLC (KCL) discovered that BellSouth's raw data is insufficient for calculating the October 2000 *Percent Provisioning Troubles within 30 Days of Service Order Activity* Service Quality Measurement (SQM) for the KCL Test CLEC.**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports<sup>1</sup>.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,<sup>2</sup> along with technical assistance<sup>3</sup> from BellSouth when necessary.

### **Issue:**

KCL attempted to replicate the KCL Test CLEC's October 2000 SQM report for the *Percent Provisioning Troubles within 30 Days of Service Order Activity* SQM with the guidance of the November 15, 2000 version of the *PMAP Raw Data User Manual*. KCL discovered that two variable fields mentioned in the computation instructions of the manual were missing from the September 2000 Order Completion Interval (OCI) data file, which is used to generate the denominator counts in the October SQM. The following table lists the *Raw Data User Manual* steps in question along with the fields that were missing from the OCI data:

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<sup>1</sup> These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

<sup>2</sup> The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The manual is posted and updated on the PMAP site.

<sup>3</sup> "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

## EXCEPTION 123

### BellSouth Georgia OSS Testing Evaluation

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<b>Raw Data Manual Location</b>	<b>Instruction</b>	<b>Missing Fields</b>
Step 7; Bullet 2	If <b>nods_ticket_source</b> = 1 then exclude records where <b>cmplt_n_dt</b> is null or blank else if <b>nods_ticket_source</b> = 0 then exclude records where <b>wo_cmplt_n_dt</b> is null or blank.	<b>nods_ticket_source;</b> <b>wo_cmplt_n_dt</b>
Step 8; Bullets 5	If <b>nods_ticket_source</b> = 1 then include records with a <b>cmplt_n_dt</b> between the first and last day of the prior month for which the raw data is valid. (For July raw data the <b>cmplt_n_dt</b> is between June 1 and June 30)	<b>nods_ticket_source;</b> <b>wo_cmplt_n_dt</b>
Step 8; Bullet 6	If <b>nods_ticket_source</b> = 0 then include records with a <b>wo_cmplt_n_dt</b> between the first and last day of the prior month for which the raw data is valid. (For July raw data the <b>wo_cmplt_n_dt</b> is between June 1 and June 30)	<b>nods_ticket_source;</b> <b>wo_cmplt_n_dt</b>

### Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KCL's inability to replicate report values signifies that the accuracy of BellSouth's calculations for this SQM may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

Date: November 21, 2000

**EXCEPTION REPORT**

An exception has been identified as a result of the CRIS/CABS Invoicing Functional Test (BLG-1).

**Exception:**

**BellSouth issued multiple bills that contained incorrectly rated and missing charges.**

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to KPMG Consulting LLC (KCL). Multiple bills received by KCL contained incorrectly rated charges and missing charges.

**Incorrectly Rated Charges**

**USOC NPU:** BellSouth inappropriately billed the KCL test CLEC for pro-rated and monthly recurring charges for the Universal Service Order Code (USOC) NPU, Listing Not in Directory. The monthly rate for this USOC is \$3.50 per month, as listed in the *BellSouth Georgia General Subscriber Service Tariff, 11<sup>th</sup> Revised Page 3 (effective January 15, 2000)*. BellSouth is assessing pro-rated and non-prorated monthly-recurring charges for this USOC using a monthly rate of \$2.89 or \$1.40. Representative occurrences of this issue are found on the following invoices:

<b><u>Telephone Number</u></b>	<b><u>Service Order</u></b>	<b><u>Account Number</u></b>	<b><u>Invoice Date</u></b>
706-774-9585	CPN4C877	706Q858252252	9/5/00
706-774-9825	CPD989B5	706Q858252252	9/5/00
706-774-0796	FPQM7346	706Q858252252	10/5/00
706-774-0796	TPQM7346	706Q858252252	10/5/00
706-774-1688	CPTMH685	706Q858252252	10/5/00
706-828-3443	CPNKJ648	706Q858252252	10/5/00
706-774-6011	DPD77KY0	706Q858252252	10/5/00
478-746-5518	FPW47666	706Q858252252	11/5/00

**Missing Charges**

**USOC SOMEK:** BellSouth did not bill the KCL test CLEC for the one-time charge for the Universal Service Order Code (USOC) SOMEK, CLEC Service Request Processing, Per Mechanized LSR, or for the one-time charge for the USOC SOMAN, CLEC Service Request Processing, Per Manual LSR. These USOCs are listed in the rate spreadsheets

**EXCEPTION 124**

## BellSouth Georgia OSS Testing Evaluation

created for the KCL test CLEC in lieu of an Inter-Connection Agreement with the following rates:

- \$3.50 for SOMECH – Non-recurring charge for 2-Wire Voice Grade Loop/Line Port Combination - OSS LSR Charge, Electronic, per LSR received from the CLEC by one of the OSS interactive interfaces.
- \$19.99 for SOMAN – Non-recurring charge for incremental manual service order.

A review of the invoices shows that BellSouth did not bill the KCL test CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

<u>PON</u>	<u>Service Order #</u>	<u>Account #</u>	<u>Invoice Date</u>
441R214PTJ000001	CPN4C877	706Q858252252	9/5/00
602R214PEJ100001	CPD989B5	706Q858252252	9/5/00
432R214PEJ000001	TPQM7346	706Q858252252	10/5/00
625R214PTJ000003	CPTMH685	706Q858252252	10/5/00
440R124PEJ000003	CPNKJ648	706Q858252252	10/5/00
422R114PEJ000001	NPCPBHP7	706Q893707707	10/19/00
444R214PTJ100003	DPD77KY0	706Q858252252	10/5/00
423R114PTJ100001	NPC3KKX8	706Q893707707	10/19/00
435R114PTJ000013	FPW47666	706Q858252252	11/5/00
435R114PTJ000013	TPW47666	706Q858252252	11/5/00

**Impact**

Issuing bills containing incorrectly rated or missing charges will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

# BELLSOUTH'S RESPONSE TO RE-OPENED EXCEPTION 47



January 10, 2001

## EXCEPTION REPORT

### KPMG re-opens Exception 47.

**Background:** On September 22, 2000 KPMG Consulting (KCL) filed a closure report for Exception 47 with the Georgia Public Service Commission. The title of the exception was:

**BellSouth delivered inaccurate partially-mechanized CLRs.**

In its closure report for Exception 47, KCL noted the following:

**BLS Training:** "BellSouth provided supplemental work group training to its Service Representatives on 3/20/00 and individual SR training on 4/5/00 to enhance the ability to deliver consistent and accurate responses to LSRs."

**KCL Re-Test Results:** "Following BellSouth's training of its ordering service representatives, KCL experienced 3 additional occurrences of inaccurate CLRs, representing less than 5% of partially-mechanized CLRs reviewed. BellSouth subsequently generated confirmations for these transactions following a review requested by KPMG. This percentage of inaccurate CLRs did not significantly affect KCL's ability to proceed with its ordering processes."

### Statement of Re-Opening for Exception 47:

KCL initiated a functional re-test on August 25, 2000. While the purpose of the re-test was not to measure CLR accuracy, KCL noted a growing number of inaccurate error messages received during testing. For partially-mechanized clarifications received between August 25 and November 9, 2000, KCL determined nearly 10% to be inaccurate. The following table provides detail on these responses.

PON* VER CC	Date of Error	Error Description	KCL Comments	BellSouth Response
432R214PEJ000001*00 9990	8/28/00	"Invalid ACT Type for Outside Move....KMX1773 8-28-00"	Service request was submitted for an Inside Move. ACT TYPE was correct according to LEO Guide Volume 1 Business Rules.	Agree Service Rep error and Reps were covered on 11/13/00
329R212PEI001001*03 7727	9/6/00	"You only address 3 of the 4 telephone #s on the CSR. Is 706 722-6533 remaining with Bell or being disconnected?"	Following the guidelines outlined in a BLS Carrier Notification SN91081619, KCL provided the new BTN in the REMARKS section of the LSR.	Agree Service Rep error and Reps were covered on 11/13/00

## BELLSOUTH'S RESPONSE TO RE-OPENED EXCEPTION 47

PON* VER CC	Date of Error	Error Description	KCL Comments	BellSouth Response
349R212PEI000003*00 7050	9/21/00	"Process Manually: Not all numbers on CSR are being ported out."	KCL was issuing a service request for a partial migration; not all of the customer's TNs are required to be addressed on an LSR.	As noted by KPMG Service Rep recognized error and communicated mistake to KMPG. No further action needed.



## BELLSOUTH'S RESPONSE TO RE-OPENED EXCEPTION 47

PON* VER CC	Date of Error	Error Description	KCL Comments	BellSouth Response
353R212PEI001001*01 7727	11/07/00	"Process Manually: Not all numbers on CSR are being ported out."	KCL was issuing a service request for a partial migration: not all of the customer's TNs are required to be addressed on an LSR. Electronic submission of these orders should be allowed.	Agree Service Rep error and Rep will be covered by 12/13/00
353R212PEI001003*00 7727	11/10/00	"Process Manually: Not all numbers on CSR are being ported out."	KCL was issuing a service request for a partial migration: not all of the customer's TNs are required to be addressed on an LSR. Electronic submission of these orders should be allowed.	Agree Service Rep error and Reps were covered 11/10/00
318R112PEH101007*0 0 9994	11/10/00	"CLARIFY-end user LOC not chg'd, CC Code on LSR doesn't match CC on BAN DC1774."	According to KCL logs, the CC and BAN did match. KCL subsequently received another CLR stating that previous response was clarified in error.	Agree Service Rep error and Reps were covered 11/10/00
404R223PEM100003*0 0 9994	9/26/00	"Listed Address invalid on DL form"	LA was entered as LaVista Rd NE with no number which is valid for the LA field on a DL Form. A customer may request to list only the street name in the directory.	Agree Service Rep error and Reps were covered 11/10/00
328R312PTI000001*01 7050	10/17/00	"Ref Num 1 duplicated and List Act V invalid on DLR Tab."	There are 2 TNs being ported. The LN provided on the DL Form is for the TN associated with LSNP Ref Num 1. Therefore, Ref Num 1 is shown on both the DL Form and on the referenced LSNP Form.	Agree Service Rep error and Reps were covered 11/10/00
353R212PTI000002*01 7050	10/17/00	"Ref Num 2 duplicated and List Act V invalid."	There are 2 TNs being ported. The LN provided on the DL Form is for the TN associated with LSNP Ref Num 2. Therefore, Ref Num 2 is shown on both the DL Form and on the referenced LSNP Form.	Agree Service Rep error and Reps were covered 11/10/00. VER 07 was received on 11/13/00 and processed correctly.

## BELLSOUTH'S RESPONSE TO RE-OPENED EXCEPTION 47

PON* VER CC	Date of Error	Error Description	KCL Comments	BellSouth Response
801R222PTI000002*04 7125	10/17/00	"IMPCON must be a toll free number or local no to the end user address."	This is an Issue 9 requirement, not an Issue 7 requirement. This order was supped 2 additional times and received the same error message.	Agree Service Rep error and Reps were covered 11/10/00
801R222PTI000002*05 7125	11/7/00	"IMPCON must be local or toll free number from the end user's location."		Agree Service Rep error and Reps were covered 11/10/00
801R222PTI000002*06 7125	11/10/00	"3rd request. IMPCON must be local or toll free number to end user's address."		Agree Service Rep error and Reps were covered 11/10/00. VER 07 was received on 11/13/00 and processed correctly.
801R222PEI000004*01 7125	11/9/00	"IMPCON should be local or toll free to end user's address-Austin Ext 1821"	This is a requirement for Issue 9 of BLS electronic interfaces, not an Issue 7 requirement.	Agree Service Rep error and Reps were covered 11/10/00
350R112PEI000004*02 7125	11/7/00	"IMPCON is required with local or toll free number to end user's address -Austin Ext 1821."	This is a requirement for Issue 9 of BLS electronic interfaces, not an Issue 7 requirement.	Agree Service Rep error and Reps were covered 11/10/00

Based on subsequent testing activities, KCL has determined that BellSouth has not adequately addressed the issues initially raised in Exception 47. As a result, KCL re-opens Exception 47.

### BellSouth Response

BellSouth's responses to the individual occurrences have been incorporated into the above table.

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95



January 8, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

#### **Exception:**

**BellSouth has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.**

After an LSR is received by the BellSouth interface gateway, it proceeds through a series of order validations to ensure that the CLEC has adhered to business rule requirements documented by BellSouth. These documented requirements are intended to reflect the BellSouth system requirements for order processing. In response to a valid LSR, BellSouth returns an FOC, notifying the CLEC that its order is confirmed and providing a committed due date for completion of service provisioning. In the event an LSR contains an error, BellSouth should return an Error (ERR) or Clarification (CLR) notification.

In response to some KPMG Consulting LLC (KCL) LSRs containing data values populated contrary to business rule documentation, BellSouth delivered FOCs. After issuing confirmation, BellSouth proceeded to provision the service request, subsequently generating a Completion Notice (CN). BellSouth should have issued error messages in response to these service requests, allowing KPMG the opportunity to make corrections to ensure that service provisioning matches the service desired.

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95

The following table provides detail on a sample of orders that should have received errors (as defined in the "Expected Results" column). All of these service requests were confirmed and completed (as noted in the "Actual Results" column).

<b>PON*VER Company Code (CC)</b>	<b>Order Type</b>	<b>Actual Results</b>	<b>Expected Results</b>
433A124PTJ100001*01 CC = 9991	<b>MM</b> Loop-Port Combination Inside Move	FOC/CN	According to BellSouth documentation, requests for feature changes are disallowed for this order type. An error message should have been received.
602A214PTJ100002*00 CC = 9991	<b>MD</b> Loop-Port Combination Partial Disconnect	FOC/CN	According to BellSouth documentation, an activity type "D" should only be used for full (i.e., all of a customer's lines) disconnect requests. Activity type "C" should be used for partial disconnects. KPMG issued a partial disconnect using a "D" activity type. An error message should have been received.
406C213PTO100012*06 CC = 9994	<b>MV</b> Full Migration As Specified	FOC/CN	On migration-as-specified service requests, the CLEC should enter feature detail information on those service features the customer wants to add or maintain on their line. Requests for feature deletion are performed via change orders. On this LSR, KPMG inserted a feature activity code of "D", for delete. An error message should have been delivered.
305A112PTH100001*18 9994	<b>AV</b> Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
305A112PEH100003*00 9994	<b>AV</b> Full Migration to UNE Loop	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95

<b>PON*VER Company Code (CC)</b>	<b>Order Type</b>	<b>Actual Results</b>	<b>Expected Results</b>
374A225PEG100006*00 9992	CV Stand Alone INP	FOC/CN	Service request did not contain a Q Acct for billing purposes. This request should have generated an error.
403A223PEM100002*00 9994	FV Full Migration to UNE Port	FOC/CN	Service request did not contain ADL FID or a DL form. This request should have generated an error.
408A313PEM000002*00 9991	FV Resale to UNE Port Conversion	FOC/CN	Service request contained duplicate TNs on REFNUM 0016 and 0017. This request should have received an error.
443A224PEM000002*00 9991	MRS Restore Service on a UNE Loop- Port Combination account	FOC/CN	Based on BellSouth's <i>Local Exchange Ordering Guide, Volume 1 (LEO Guide)</i> , the entry ("P") in the B11 field for this order type should have produced a Clarification response from BLS, not an FOC.
606A123PTM101003*02 9991	FC TN Change for a UNE Port customer	FOC/CN	KPMG's BellSouth Customer Support Manager (CSM) informed KPMG that, on a "Change in Service for a Port" Order (Order Type "FB/C"), the LOCBAN field must be populated with the new TN in order to receive an FOC. KPMG received a FOC on this order when the LOCBAN field was populated incorrectly (i.e., it contained the customer's old TN).

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95

### Impact

The receipt of an FOC in response to an erred service request impacts CLECs in the following way:

- **Decrease in customer satisfaction.** After receiving a FOC, a CLEC assumes that all inputs on the LSR were valid, and that service will be provisioned exactly according to the LSR specifications. In cases where BellSouth inappropriately confirms and provisions service instead of issuing an error message, the service established for an end-user will differ from CLEC and end-user expectations (which were based on the incorrect LSR). The time required to diagnose the ordering problem and to re-issue the service request ultimately delays accurate provisioning of customer service. This delay will result in a decrease in customer satisfaction.

### Amended Exception (December 8, 2000)

KCL is amending this exception to include a number of Local Service Requests (LSRs) from the Resale Functional Evaluation (PO&P-11). These orders were initially referred to in a provisioning-related exception, and have also been identified as having ordering errors. Although BellSouth has indicated that the following LSRs contained errors, KCL receive Firm Order Confirmations (FOCs) for each one. For invalid service requests, KCL expects to receive Clarification responses.

PON	VER	CC	BellSouth Response
R015A21PTN000011	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTYPE is other than J.
R015A21PTN000006	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTYPE is other than J.
R015A21PTN000005	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTYPE is other than J.

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95

PON	VER	CC	BellSouth Response
R015A21PTN000004	00	9992	Agree. Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTYPE is other than J.
R015A21PEN000012	00	9992	Agree. Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTYPE is other than J.

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95

PON	VER	CC	BellSouth Response
R015A21PEN000010	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.
R015A21PEN000009	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.
R015A21PEN000008	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.
R015A21PEN000007	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.
R015A21PEN000002	00	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.
R015A12PEN100002	00	9991	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.
R011F12PTN100038	01	9992	Agree, Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQTY P is other than J.



## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 95

R015A12PEN100003	00	9992	Agree. Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQ TYP is other than J.
R011B21PTN000002	00	9991	Agree. Mechanization Issue. KPMG sent REQTYPE E in error for listing only order. Change Request 2332 submitted to clarify the order when the only activity is a listing change and the REQ TYP is other than J.

### BellSouth Response

BellSouth's responses to individual occurrences have been incorporated into the above table. All PONs added to this amended exception were due to an incorrect LSR order request sent 15 times by KPMG. BellSouth currently does not have an up front clarification edit to identify this particular LSR ordering error. Change Request 2332 has been submitted for prioritization into a future software release. When implemented Change Request 2332 will return a clarification notice if the LSR ordering error described in the above table is submitted.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 113



Date: January 8, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

### Initial Exception:

**BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL compared the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval, and Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)<sup>2</sup> that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. Table 1 shows the specific discrepancies for Commitment Date.

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<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 113

**TABLE 1—COMMITMENT DATE**

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED <sup>3</sup> VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

## Amended Exception:

**Revised BellSouth-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for three Provisioning metrics.**

KCL received revised raw data from BellSouth. KCL compared these revised raw data to the KCL-collected data.

KCL could not match the revised BellSouth-reported values with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 2 shows the specific discrepancies for Commitment Date.

<sup>3</sup> These values are contained in response files provided to KCL by HP.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 113

**TABLE 2—COMMITMENT DATE**

PON	SO_NBR	RAW DATA FILE	BLS REPORTED VALUE	KCL REPORTED VALUE	MONTH
303A222PEH101001	CO6TFTB9	JPDY	3/3/00	2/29/00	March
428A124PTJ100012	NO4HLD96	JPDY	12/30/00	2/21/00	March
406C213PTM100002	NO9HBW68	JPDY	12/30/00	1/21/00	March
428A224PTJ100009	NOBC0M48	JPDY	12/29/00	2/22/00	March
422A114PEJ101001	NOBFJ3F3	JPDY	3/3/00	2/18/00	March
302A312PEH000003	NOBQ1C99	JPDY	3/2/00	2/29/00	March
403A223PTM100003	NP32R9P9	JPDY	12/30/00	2/15/00	March
607A214PEJ102001	NP74MLL1	HO	2/16/00	12/30/00	March
422A114PEJ101001	NOBJDYR1	PMI	2/18/00	3/3/00	March
424A314PTJ000001	NO26B2P9	PMI	2/16/00	3/1/00	March
R002A11PEN100001	CP5QH432	PMI	3/21/00	3/28/00	March
R002A11PEN100003	CO270WV2	PMI	3/21/00	3/27/00	March
R002A11PEN100005	CP0X8M92	PMI	3/21/00	3/27/00	March
R002A11PTN100004	CP86GNN9	PMI	3/23/00	3/28/00	March
R002A11PTN101002	COBV58F5	PMI	3/23/00	3/27/00	March
R010A11PEN100003	CO24RH11	PMI	3/21/00	3/24/00	March
R010A11PTN100001	CO0VJ7L2	PMI	3/21/00	3/27/00	March
R010A11PTN100004	CP4CF625	PMI	3/21/00	3/23/00	March
R041A21PEN100007	NPF01H46	PMI	4/12/00	4/21/00	April
R041A21PTN100006	NP9V5K27	PMI	4/12/00	4/17/00	April
R041B21PEN100001	NPF1MLT2	PMI	4/11/00	4/17/00	April
378A315PEI001001	NP0FNX10	PMI	3/29/00	3/23/00	April
R041A12PEN100012	NP8HRNF6	PMI	5/12/00	5/19/00	May

## **BellSouth Response:**

BellSouth and KPMG have had several conference calls to investigate the discrepancy between BellSouth reported raw data values for Commitment Date for KCL Test CLEC and KCL collected values.

When KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date) that KCL received from Hewlett Packard for March, April, and May 2000, KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers.

On September 29<sup>th</sup>, it was determined that the Test CLEC data KCL downloaded from the PMAP website for the months of March, April, and May, may not have been accurate as the reports had been rerun since that time.

On September 29<sup>th</sup>, KPMG issued a data request for the following new updated raw data files for the KPMG Test CLEC for March, April, and May:

## BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 113

- (a) Average Completion Notice Interval
- (b) Held Orders
- (c) Jeopardy Notice Interval
- (d) Order Completion Interval Distribution for Trunks & Non-Trunks
- (e) Percent missed Installation Appointments for Trunks & Non-Trunks
- (f) Total Service Order Cycle Time
- (g) Troubles within 30 days of Provisioning Trunks & Non-Trunks

BellSouth sent the updated raw data to KPMG on 10/02/00 for the Data Comparison Test for ordering & Provisioning SQMs.

On November 7<sup>th</sup>, KPMG sent to BellSouth a list of PONs from the various Provisioning raw data files - Mean Held Order Interval and Distribution Intervals (HO), Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY), Percent Missed Installation Appointments (PMI), Average Completion Interval / Order Completion Interval Distribution (OCI), Average Completion Notice Interval (ACNI), and Total Service Order Cycle Time (TSOCT)- from March-Sept 2000, where KPMG could not match the service order numbers.

**In KPMG's second amended Exception 113, KPMG reported that BellSouth values for the Commitment Date (CMTT\_DATE) do not match KPMG Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for Provisioning Metrics for PMI, Jeopardy, and Held Order.**

### PMI:

**PMI requires that the first CMTT\_DATE (original due date) on the service order be used for the PMI calculation. Records with a SO\_CMTT\_TYPE\_CD = 1 represent the original due date (CMTT\_DATE) for a service order. The exclusion criteria, which only selects records with a SO\_CMTT\_TYPE\_CD = 1, is included as part of the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure.**

### Jeopardy:

The Jeopardy record, SO\_NBR = NO9HBW68 was cancelled. BellSouth's standard practice for handling cancelled orders is to assign a null value to the CMPLTN\_DT field. A documentation snapshot from the LEO source system has been provided below to provide a record of what occurred with this record prior to it reaching Jeopardy raw data. Below is a copy of the LEO Archive screen showing the create date and the date the information was rejected to the CLEC. This date is marked in red.

## BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 113

CC: 9994 PON: 406C213PTM100002

ENTER "X" FOR ON SIT

X	VER	CREATE DATE	REJECT NUMBER	ARCHIVED DATE	PURGE DATE
-	00	2000-01-11	_____	2000-08-19	2003-08-19
-	02	2000-01-17	_____	2000-08-19	2003-08-19
-	03	2000-02-18	_____1	2000-08-19	2003-08-19

The three Jeopardy records (SO\_NBR in 'NO4HLD96', 'NOBC0M48', 'NP32R9P9') have CMTT\_DATE reported in February, thus not affecting the March calculation of the Jeopardy measure.

The remaining three records can be explained using the logic that if the latest CMTT\_DATE is within the reporting month, exclude the rest of the records in the group. The three Jeopardy service orders addressed by KCL, are capturing a CMTT\_DATE prior to the latest CMTT\_DATE and from a previous month. This CMTT\_DATE should be dropped and replaced with the latest CMTT\_DATE in the current month. Exclusion criteria from the Raw Data User's Guide, used to capture the records included in the Jeopardy measure, were applied directly to the raw data after it was cut from NODS.

### Held Order:

For this held order record (SO\_NBR = NP74MLL1) the number reported by BLS for the CMTT\_DATE was 2/16/00, and the value reported by KCL was 12/30/00. According to the commitment history, the original date was 2/16/00 and then it was scheduled later to 12/30/00. This could be due to a variety of reasons, but most likely, the order was held off until further notice, so the date was scheduled far in the future.

Held Order Processing Methodology states that the last due date that carries a company missed appointment code and does not have a subsequent due date should be captured. The held interval is measured as the reporting period end date back to the first company missed date on the service order.

The date that should be captured is the original date. Therefore the date of 2/16/00 is the correct date.

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 115



January 10, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

#### Exception:

**BellSouth does not respond to Loop Make-Up Service Inquiries (LMU/SI) within the specified seven-day interval.**

According to the BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1)<sup>1</sup>, available on the BellSouth Interconnection Service Web site, a CLEC should receive a response to an LMU/SI within seven working days.

As of August 28, 2000, 26 LMU/SIs submitted by the KCL Test CLEC (25% of the total LMU/SIs submitted) had not received a response within the specified seven day interval.

The following table provides details on the 26 LMU/SIs cited in this exception. These LMU/SIs were sent between July 10<sup>th</sup> and August 8<sup>th</sup>, 2000. As of August 28<sup>th</sup>, 2000 no responses had been received.

PON	Date Sent	Submitted via facsimile/email	BST Response
X046A12002	7/10/2000	email	Not Received in CRSG
X046A110002	7/17/2000	email	Agree
X001P11004, X001P11006, X001P11007, X039A210001, X046P12007, X001P12006	7/18/2000	email	Agree
X039A11004, X039A12004	7/20/2000	email	Received 9/19 & 9/20 respectively in CRSG email sent 9/21 to Mark Buckman. Will fax e-mail upon request.
X039P12006, X046BP11003, X046BP11004, X046BP11006, X046BP11007, X046BP11009, X046BP11010	7/21/2000	email	Agree
X0R03A, X0R04A, X0R05A, X0R06A, X0R08A, X0R09A, X0R011A, X0R012A, X0R014A	8/8/2000	facsimile	Agree

<sup>1</sup> BellSouth Loop Makeup (LMU) CLEC Information Package (Version 1):  
<http://www.interconnection.bellsouth.com/products/UNE/bstlmu.pdf>.

## **BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 115**

### **Impact:**

The absence of timely responses to LMU/SIs Inquiry impact CLECs in the following ways:

- Decrease in customer satisfaction. A delay in the return of an LMU/SI will delay the ordering and provisioning of xDSL services. This will negatively impact CLEC customer satisfaction.
- Increase in operating costs. CLECs will also likely incur additional costs associated with researching the status of untimely LMU/SIs.

### **BellSouth Response**

BellSouth's responses to the individual occurrences have been incorporated into the above table.



## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119



Date: January 8, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

#### Exception:

**BellSouth-reported raw data values for Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, *Average Completion Notice Interval (ACNI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMPLETION DATE<sup>2</sup> in the raw data files with the completion date that KCL received from Hewlett Packard for March through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Completion Date.

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<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> COMPLETION DATE is the actual date of completion of a service order.

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119

**TABLE 1—COMPLETION DATE**

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCL- REPORTED VALUE	MONTH
B100001PEJ101069	NP5M4544	JPDY	None	8/4/00	July
F10C121PEN101002	DO3H8C92	JPDY	None	8/2/00	July
F12C121PEN101003	DO8FR6M1	JPDY	None	8/2/00	July
303R222PEH000002	CO0FWMC9	JPDY	None	10/5/00	September
307R122PEH000003	CO646VD9	JPDY	None	10/3/00	September
315R212PTH000005	CODJQDQ0	JPDY	None	10/9/00	September
323R122PEH002001	DP4C6GR1	JPDY	None	10/5/00	September
323R122PTH100003	DODP2694	JPDY	None	10/9/00	September
324R112PEH000001	CO477D06	JPDY	None	10/4/00	September
422R114PEJ100003	NO4575K2	JPDY	None	10/10/00	September
428R124PEJ100004	NP993VF0	JPDY	None	10/4/00	September
441R214PTJ000003	CPW3G381	JPDY	None	9/21/00	September
444R214PTJ100002	DPB5FYN7	JPDY	None	10/9/00	September
452R216PTF000002	RP7BNJW8	JPDY	None	10/2/00	September
627R214PTJ100004	CPV7D650	JPDY	None	10/6/00	September

## **BellSouth Response:**

KPMG reported that BellSouth-reported raw data values for the completion date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and Service Order numbers for the Jeopardy measure.

The Jeopardy measure requires that the completion date (CMPLTN\_DT) for a service order number (SO\_NBR) be reported in the month that the order is completed. Therefore, a record that is in Jeopardy will contain a null value in the CMPLTN\_DT field for each month until the order is completed.

The service order numbers provided by KCL have completion dates that fall in the subsequent months. The following service orders; NP5M4544, DO3H8C92, and DO8FR6M1, have completion dates in the month of August, not July. Using the same logic, the following service orders; CO0FWMC9, CO646VD9, CODJQDQ0, DP4C6GR1, DODP2694, CO477D06, NO4575K2, NP993VF0, DPB5FYN7, RP7BNJW8, and CPV7D650 have completion dates in the month of October, not September. The data verifies that these records can be located in the month corresponding to their completion date.

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119

### Records Missing Completion Date:

Service Order CPW3G381 was completed 09/21/00 per attached MOBI records. however due to a completion error the order did not post an overall completion date until 10-04-00. The service order has purged from the SOCS system making it possible to pull a history to identify the error which caused this delay. The following data was retrieved from LEO which validates the due date (09-21-00) and the overall completion date (10-04-00) when the error was corrected which issued the overall completion notice to LEO. An explanation for BellSouth's completion dates is highlighted within these screen prints:

### LEO VERIFICATION

CPW3G381 912-746-1792

DB02C291 IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 441R214PTJ000003 VER: 00 SUP: 00 JUMP TO: \_\_\_\_\_

LSRNO: 999020000920000008 TCIF: \*\*\*7 DUE DATE: 09/21/2000

AN: - - - ATN: - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

09/21/2000 07.48.12 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

09/21/2000 07.48.19 ISS CPW3G381 DD 9-21 DC 1774

09/21/2000 07.48.40 TAGR PON POSTED AS ACKNOWLEDGED

10/04/2000 15.47.51 C475 POS ISSUED, SOCS STATUS - PD PENDING ORDE  
R

10/04/2000 15.50.18 TAGR PON POSTED AS ACKNOWLEDGED

10/04/2000 16.02.17 C280 PREVIOUS FOC HAS BEEN SENT, NO ACTION TAKEN.

10/04/2000 16.32.30 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS CHANGED  
TO "P" (ERROR CORRECTED)

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119

## LEO VERIFICATION PAGE 2

CPW3G381 912-746-1792

DB02C291 IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 441R214PTJ000003 VER: 00 SUP: 00 JUMP TO: \_\_\_\_\_

LSRNO: 999020000920000008 TCIF: \*\*\*7 DUE DATE: 09/21/2000

AN: - - - ATN: - - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

10/04/2000 16.32.30 C475 865 ISSUED RETURN-FEED # 0003 COMPLETION SENT

10/04/2000 16.33.21 TAGR PON POSTED AS ACKNOWLEDGED

10/14/2000 12.48.04 SPLT GEORGIA 912/478 NPA SPLIT  
TENDU LOCBAN

10/14/2000 14.15.58 SPLT GEORGIA 912/478 NPA SPLIT  
TLSR LOCBAN-TN

10/14/2000 14.15.59 SPLT GEORGIA 912/478 NPA SPLIT

TLSR LSO

10/14/2000 16.52.24 SPLT GEORGIA 912/478 NPA SPLIT  
TRSLE TRSLE.TN

10/14/2000 16.52.24 SPLT GEORGIA 912/478 NPA SPLIT  
TRSLE TRSLE.TN

NOTE: LON VERIFICATION DOES NOT INDICATE A SUP DD.  
MOBI INDICATES A 9-21-00 COMPLETION DATE  
CRIS CYCLE NUMBER 2489 - DATE RECVD ACCTG 10-05-00

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119

## LEO COMPLETION NOTICE

CPW3G381 912-746-1792

FOR: DB02C430

IOA FOC/CN SCREEN

YHBKCDT

\*TCIF \*\*\*7 \*\*

ACCTNUM: 912 746-1792 CC: 9990 PON: 441R214PTJ000003 VER: 00

AN:

ATN:

LSRNO: 999020000920000008

FOC/CN: CN

LSR SECTION

TRAN-ACK-TYPE: AT CD/TSENT: 2000-09-20

TRAN-TYPE: 865 BST-NAME: BST DATE-TIME-SENT: 2000-10-04-16.32.30.766174

SYSTEM-INIT-ID: TAG TEST-IND: P IS-ID: GS-ID:

DD: 2000-09-21 RORD:

BI1: BAN1: 706Q858252252 BI2: BAN2: FDD: - -

DSGCON:

CCNA: ZXC CLS-SVC:

INIT: MARJORIE BELILE

INIT TEL-NO: 2154057432

REP: LCSC

REP-TELNO: 1-800-667-0807

ORD: CPW3G381

EBD: - - CHC: FDT:

REMARKS SECTION

NOTE: THIS ORDER HAD AN ERROR NOT CLEARED ON ACTUAL COMPLETION DATE.  
EX: LIST (LCP) OR OPEX (OCP)

## MOBI RECORD

912 746-1792 10020000921MCN 20000920083020000921

CPW3G381A095 UEPBXYAXQAV720000921 X (COMPLETION DATE)

ZRTI \$,QS,800 872-3116,DC

In response to the second service order = **RP7BNJW8** KPMG requested verification of the actual cancellation date. BellSouth retrieved LEO records to document the date and time the cancellation was sent from SOCS. This was necessary due to the SOCS records being purged and MOBI not providing this information. The following is a copy of these records. An explanation for BellSouth's completion dates is highlighted within these screen prints

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119

## LEO VERIFICATION

RP7BNJW8 706-774-6120

DB02C291 IOA LEO AUDIT SYSTEM - BROWSE SCREEN (AUD) PNLFPMY

RESH/CC: 9990 PON: 452R216PTF000002 VER: 00 SUP: 00 JUMP TO: \_\_\_\_\_

LSRNO: 999020001002000004 TCIF: \*\*\*7 DUE DATE: 10/02/2000

AN: - - - ATN: - - THIS LSR: NEXT LSR:

DATE TIME TYPE HISTORY LINE

ERRNO XREF

10/02/2000 16.48.19 ERRC ORDER ERR: RP7BNJW8 AECN IDNT 009 L AECN MUST  
AP

8825 LSG 0136 PEAR!

10/02/2000 16.49.11 ISSU RP9Y1V97:DD 10-06-00

10/02/2000 16.49.18 C280 8#5 FOC STAGED FOR LSR, LEO STATUS CHANGED TO "F"

10/02/2000 16.49.18 C475 855 ISSUED RETURN-FEED # 0001 FOC SENT

10/02/2000 16.50.08 TAGR PON POSTED AS ACKNOWLEDGED

10/02/2000 17.02.28 C280 CANCEL SVC ORD BYPASSED, SUPP NOT = "01"

(THIS IS THE DATE AND TIME CANCELLATION SENT FROM SOCS TO LEO)

10/02/2000 17.33.05 C280 865 COMPLETION STAGED FOR LSR, LEO STATUS  
CHANGED

TO "P"

NOTE: ORDER CANCELED - NO SOCS HISTORY AVAILABLE

MOBI INDICATES CRIS CYCLE NUMBER 2487

DATE RCVD ACCTG 10-03-00

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 119

## LEO COMPLETION NOTICE

/FOR: DB02C430 I0A FOC/CN SCREEN YHBKCDT  
\*TCIF \*\*\*7 \*\*  
ACCTNUM: 706 774-6120 CC: 9990 PON: 452R216PTF000002 VER: 00  
AN: ATN:  
LSRNO: 999020001002000004 FOC/CN: CN

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### LSR SECTION

TRAN-ACK-TYPE: AT CD/TSENT: 2000-10-02  
TRAN-TYPE: 865 BST-NAME: BST DATE-TIME-SENT: 2000-10-02-17.33.05.622331  
THIS IS THE DATE / TIME NOTIFICATION SENT TO CLEC  
SYSTEM-INIT-ID: TAG TEST-IND: P IS-ID: GS-ID:  
DD: 2000-10-02 RORD:  
B11: BAN1: 706Q858252252 B12: BAN2: FDD: - -  
DSGCON: CCNA: ZXC CLS-SVC:  
INIT: MARJORIE BELILE INIT TEL-NO: 2154057432

REP: LCSC REP-TELNO: 1-800-667-0807  
ORD: RP9Y1V97 EBD: - - CHC: FDT:  

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### REMARKS SECTION

## BELLSOUTH'S RESPONSE TO EXCEPTION 120



January 2, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning service quality measurements (SQMs).

#### Exception:

**BellSouth-reported raw data files used in the calculation of three ordering metrics for the KCL Test CLEC incorrectly report certain purchase order numbers and version numbers as non-mechanized orders in August and September 2000.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission (GPSC), BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL compared the data that BellSouth uses to produce SQM reports for the KCL Test CLEC with the corresponding data that KCL collects using its own test management tools. KCL looked at the purchase order numbers and the version numbers in the raw data reported by BellSouth in PMAP for the Test CLEC for August and September 2000. It found that certain Purchase Order Numbers (PONs) and Version Numbers (VERs) were listed as NON-MECHANIZED orders. Table 1 lists a sample of such PONs and VERs from the raw data file "Ordering Service Orders".

***Table 1—PONs & VERs listed as NON-MECHANIZED***

PON	VERSION	MONTH
303R222PEH000001		August
307R122PTH000001		August
315R212PTH000001		August
318R112PEH000001		August
320R212PEH000001		August
395R213PTM100001	O	August
398R213PTM000001		August
399R213PEM100001	I	August
432R214PEJ000001		August

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.



# BELLSOUTH'S RESPONSE TO EXCEPTION 120

PON	VERSION	MONTH
435R114PEJ000001		August
452R216PEF000001	1	August
511R212PEH000001	0	August
602R214PEJ100001	0	August
605R214PTJ000001		August
609R214PEJ000001	0	August
625R214PTJ000002	0	August
R013B21PTN000010		August
301R112PTF100005		September
301R112PTF101005	3	September
301R112PTH000002	0	September
301R112PTH000003	2	September
302R312PTH000001	2	September
302R312PTH001001	0	September
303R222PEF000001	0	September
303R222PEF100005	1	September
303R222PEH000002		September
303R222PEH002001		September
303R222PTF000003	1	September
303R222PTH000003	1	September
305R112PEF100010	0	September
305R112PEH000002		September
305R112PEH000005		September
305R112PEH000006	0	September
305R112PTH000007		September
305R112PTH000008		September
305R122PEH000005	6	September
305R222PTH000004		September
307R122PEF000003		September
307R122PEF000009	0	September
307R122PEF000010	0	September
307R122PEF000011	0	September
307R122PEH000003	2	September
307R122PEH000004		September
307R122PEH000005	0	September
307R122PTH000002	0	September
307R122PTH001001		September
307R122PTH003001		September
307R222PTF000006	0	September
307R222PTF000006	0	September
307R222PTH000003	1	September
307R222PTH100002	1	September
315R212PEH000002	0	September
315R212PEH000003	0	September
315R212PEH000004	1	September
315R212PTH000005	0	September
315R212PTH001001	2	September
317R122PEH000002	0	September
317R122PEH000004	0	September

# BELLSOUTH'S RESPONSE TO EXCEPTION 120

PON	VERSION	MONTH
317R122PTH000001	1	September
317R122PTH000003	0	September
318R112PEF000002	O2	September
318R112PEH000004	0	September
318R112PEH000005	0	September
318R112PEH001001		September
318R112PTH000003	O	September
318R112PTH100006		September
320R212PTH000002	0	September
324R112PEH000001	1	September
324R112PTH000002	0	September
3-7R122PEH000004		September
395R213PEM100002	O	September
395R213PTM100003	O	September
398R213PEM000002		September
398R213PTM000003		September
399R213PEM000003		September
399R213PTM100002		September
404R223PEM100003	1	September
404R223PTM100002	0	September
409R223PEM100003	1	September
409R223PTM100002	O	September
409R223PTM100004		September
409R223PTM101002	0	September
414R223PEM000001	O	September
414R223PEM000002	1	September
414R223PTM000003	O	September
415R213PEM000003	O	September
415R213PEM000004	0	September
415R213PTM000002	0	September
415R213PTM001002		September
419R223PEM100001		September
419R223PEM101001		September
419R223PTM100002	O	September
419R223PTM100003	O	September
419R223PTM100004	0	September
419R223PTM100005	O	September
432R214PEJ000003		September
432R214PTJ000002	O	September
435R114PEJ000003		September
440R124PTJ000001	O	September
440R1W4PTJ000002		September
441R214PEJ000002	0	September
441R214PTJ000003		September
511R212PEH001001	1	September
511R212PTH000003	0	September
511R212PTH000004	0	September
602R214PEJ100003	O	September
605R214PEJ000002	0	September

## BELLSOUTH'S RESPONSE TO EXCEPTION 120

PON	VERSION	MONTH
605R214PTJ000003		September
606R123PTM000002	0	September
606R123PTM000004	0	September
606R123PTM001002		September
615R122PEH000002		September
625R214PEJ000008	0	September
625R214PTJ000003		September
625R214PTJ000006	0	September

### **BellSouth Response**

In Georgia Draft Exception #162, KPMG observed that certain purchase order numbers and version numbers were incorrectly being reported as non-mechanized orders for the KCL Test CLEC in August and September 2000 raw data.

The LSRs related to the PONs in question were submitted electronically and then fell out for manual handling – becoming partially-mechanized orders. In response to Georgia Draft Exception #162, it was determined that these LSRs were incorrectly classified as non-mechanized LSRs.

BellSouth has taken the following action to prevent partially-mechanized LSRs from being reported as non-mechanized LSRs: BellSouth has classified records where the first character of the 'image' field is 0, 1, 2, 3, 4, 5, 6, 7, 8, or 9 as non-mechanized. Any records that do not have a fax image number in the 'image' field are counted as mechanized or partially mechanized, differentiated by the "claimed by" field.

This change was completed in **Change Request #572** and became effective beginning with October data.

## BELLSOUTH'S RESPONSE TO EXCEPTION 122



Date: January 10, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

#### **Exception:**

**Definitions and Business Rules in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)* are incomplete or inaccurate for the Firm Order Confirmation (FOC) Timeliness and Reject Interval Ordering Service Quality Measurements.**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the state of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KPMG Consulting, LLC (KCL) is reviewing the *SQM Reports*.<sup>2</sup> KCL is evaluating the accuracy and completeness of each metric's stated definition, calculation, and business rules, as well as the consistency between these items.

KCL observed the following.

#### **1. Ordering – FOC Timeliness**

Examples of the business rules listed in *SQM Reports* for Fully Mechanized and Partially Mechanized are as follows:

---

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") web site.

<sup>2</sup> KCL used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KCL also took into consideration changes published over time in more recent versions of the *SQM Reports*. The Business Rules listed in this Exception are listed in the *SQM Reports* published at the end of November 2000.

## BELLSOUTH'S RESPONSE TO EXCEPTION 122

- **“Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC.”
- **“Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC.”

BellSouth has recently informed KCL that it records the LEO time stamp for both the incoming and outgoing timestamps for purposes of SQM reporting, which would seemingly contradict the Commission-approved SQM definitions, based on our professional judgment. For inbound LSRs the definition is very clear, specifying use of the specific interface timestamps. The outbound timestamp to be used based on the definition is less clear. However, KCL, based on its professional judgment, interprets the point at which an FOC is “returned to the CLEC” to be the point at which the BellSouth interface gateway transmits the FOC to the CLEC interface. At the time at which an FOC is sent from LEO to the BellSouth interface gateway (the measurement point recorded per BellSouth’s current practice), the FOC has not yet been returned to the CLEC, but has been transmitted from one BellSouth system to another.

### 2. Ordering – Reject Interval

The business rules listed in *SQM Reports* for Fully Mechanized and Partially Mechanized, as examples, are as follows:

- **“Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected (date and time stamp or reject in LEO). Auto Clarifications are considered in the Fully Mechanized category.”
- **“Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LEO.”

BellSouth has recently informed KCL that it records the LEO time stamp for both the incoming and outgoing timestamps for purposes of SQM reporting, which would seemingly contradict the stated SQM definitions based on our professional judgment.

## BELLSOUTH'S RESPONSE TO EXCEPTION 122

### BellSouth Response:

1. The Business Rule in the current Georgia SQM for the Fully Mechanized *FOC Timeliness Report* uses the date and time stamps in EDI, LENS or TAG. However, BellSouth is currently capturing and reporting the start date and time stamp and stop date and time stamp from LEO because there is no direct feed from EDI, LENS or TAG at this time. A Work Request (CMVC 11912) has been opened and is pending for BTSI to provide the necessary date and time stamps from EDI, LENS and TAG to PMAP. There is also a Change Request (898) in TeamConnection in anticipation of the direct feeds from the CLEC ordering systems to PMAP.

The pending GA Rocket Docket SQM will include the following Business Rules:

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is processed, appropriate service orders are generated and a Firm Order Confirmation is returned to the CLEC via EDI, LENS or TAG.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) which falls out for manual handling until appropriate service orders are issued by a BellSouth service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC via EDI, LENS or TAG.

2. The Business Rule in the current Georgia SQM for the Fully Mechanized *Reject Interval Report* uses the date and time stamps in EDI, LENS or TAG. However, BellSouth is currently capturing and reporting the start date and time stamp from LEO because there is no direct feed from EDI, LENS or TAG at this time. The stop date and time is currently captured from LEO. A Work Request (CMVC 11912) has been opened and is pending for BTSI to provide the necessary date and time stamps from EDI, LENS and TAG to PMAP. There is also a Change Request (899) in TeamConnection in anticipation of the direct feeds from the CLEC ordering systems to PMAP.

The pending GA Rocket Docket SQM will include the following Business Rules:

- **Fully Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until the LSR is rejected via EDI, LENS or TAG. Auto Clarifications are considered in the Fully Mechanized category.
- **Partially Mechanized:** The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS or TAG) until it falls out for manual handling. The stop time for partially mechanized LSRs is when a "Clarification" is returned to the CLEC via EDI, LENS or TAG.

# BELLSOUTH'S RESPONSE TO EXCEPTION 123



January 2, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

### Exception:

**KPMG Consulting LLC (KCL) discovered that BellSouth's raw data is insufficient for calculating the October 2000 *Percent Provisioning Troubles within 30 Days of Service Order Activity* Service Quality Measurement (SQM) for the KCL Test CLEC.**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports<sup>1</sup>.

As part of the BellSouth-Georgia OSS Evaluation, KCL is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KCL has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,<sup>2</sup> along with technical assistance<sup>3</sup> from BellSouth when necessary.

### Issue:

KCL attempted to replicate the KCL Test CLEC's October 2000 SQM report for the *Percent Provisioning Troubles within 30 Days of Service Order Activity* SQM with the guidance of the November 15, 2000 version of the *PMAP Raw Data User Manual*. KCL discovered that two variable fields mentioned in the computation instructions of the manual were missing from the September 2000 Order Completion Interval (OCI) data file, which is used to generate the denominator counts in the October SQM. The following table lists the *Raw Data User Manual* steps in question along with the fields that were missing from the OCI data:

---

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

<sup>2</sup> The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The manual is posted and updated on the PMAP site.

<sup>3</sup> "Technical Assistance" refers to any calculation instruction KCL may have received in the replication of CLEC aggregate or non-PMAP (manually calculated) metrics.

## BELLSOUTH'S RESPONSE TO EXCEPTION 123

Raw Data Manual Location	Instruction	Missing Fields
Step 7; Bullet 2	If nods_ticket_source = 1 then exclude records where cmpltm_dt is null or blank else if nods_ticket_source = 0 then exclude records where wo_cmpltm_dt is null or blank.	nods_ticket_source; wo_cmpltm_dt
Step 8; Bullets 5	If nods_ticket_source = 1 then include records with a cmpltm_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the cmpltm_dt is between June 1 and June 30)	nods_ticket_source; wo_cmpltm_dt
Step 8; Bullet 6	If nods_ticket_source = 0 then include records with a wo_cmpltm_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the wo_cmpltm_dt is between June 1 and June 30)	nods_ticket_source; wo_cmpltm_dt

### BellSouth Response

When attempting to replicate the KCL Test CLEC's October 2000 SQM report for the *Percent Provisioning Troubles within 30 Days of Service Order Activity* SQM the September 2000 Order Completion Interval (OCI) data file is used to calculate the denominator.

The November 15, 2000 version of the *PMAP Raw Data User Manual (RDUM)* contains a documentation error for the *Percent Provisioning Troubles within 30 Days* measure. There are several instructions referring to the Order Completion Interval (OCI) data file that are incorrect. These instructions have been removed and the changes are reflected in the current RDUM (December 15, 2000 version). The following instructions have been removed:

- **Step 7; Bullet 2:** If nods\_ticket\_source = 1 then exclude records where cmpltm\_dt is null or blank else if nods\_ticket\_source = 0 then exclude records where wo\_cmpltm\_dt is null or blank.



## BELLSOUTH'S RESPONSE TO EXCEPTION 123

- **Step 8; Bullet 5:** If nods\_ticket\_source = 1 then include records with a cmpltm\_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the cmpltm\_dt is between June 1 and June 30)
- **Step 8; Bullet 6:** If nods\_ticket\_source = 0 then include records with a wo\_cmpltm\_dt between the first and last day of the prior month for which the raw data is valid. (For July raw data the wo\_cmpltm\_dt is between June 1 and June 30)

The OCI data file is not missing any variable fields; the RDUM documentation (November 15, 2000 version) incorrectly suggests the use of fields that do not exist in the OCI raw data file.

## BELLSOUTH'S RESPONSE TO EXCEPTION 124



December 20, 2000

### EXCEPTION REPORT

An exception has been identified as a result of the CRIS/CABS Invoicing Functional Test (BLG-1).

#### Exception:

**BellSouth issued multiple bills that contained incorrectly rated and missing charges.**

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to KPMG Consulting LLC (KCL). Multiple bills received by KCL contained incorrectly rated charges and missing charges.

#### Incorrectly Rated Charges

**USOC NPU:** BellSouth inappropriately billed the KCL test CLEC for pro-rated and monthly recurring charges for the Universal Service Order Code (USOC) NPU, Listing Not in Directory. The monthly rate for this USOC is \$3.50 per month, as listed in the *BellSouth Georgia General Subscriber Service Tariff, 11<sup>th</sup> Revised Page 3 (effective January 15, 2000)*. BellSouth is assessing pro-rated and non-prorated monthly-recurring charges for this USOC using a monthly rate of \$2.89 or \$1.40. Representative occurrences of this issue are found on the following invoices:

<u>Telephone Number</u>	<u>Service Order</u>	<u>Account Number</u>	<u>Invoice Date</u>
706-774-9585	CPN4C877	706Q858252252	9/5/00
706-774-9825	CPD989B5	706Q858252252	9/5/00
706-774-0796	FPQM7346	706Q858252252	10/5/00
706-774-0796	TPQM7346	706Q858252252	10/5/00
706-774-1688	CPTMH685	706Q858252252	10/5/00
706-828-3443	CPNKJ648	706Q858252252	10/5/00
706-774-6011	DPD77KY0	706Q858252252	10/5/00
478-746-5518	FPW47666	706Q858252252	11/5/00

#### Missing Charges

**USOC SOMEK:** BellSouth did not bill the KCL test CLEC for the one-time charge for the Universal Service Order Code (USOC) SOMEK, CLEC Service Request Processing, Per Mechanized LSR, or for the one-time charge for the USOC SOMAN, CLEC Service Request Processing, Per Manual LSR. These USOCs are listed in the rate spreadsheets created for the KCL test CLEC in lieu of an Inter-Connection Agreement with the following rates:

## BELLSOUTH'S RESPONSE TO EXCEPTION 124

- \$3.50 for SOMECH – Non-recurring charge for 2-Wire Voice Grade Loop/Line Port Combination - OSS LSR Charge, Electronic, per LSR received from the CLEC by one of the OSS interactive interfaces.
- \$19.99 for SOMAN – Non-recurring charge for incremental manual service order.

A review of the invoices shows that BellSouth did not bill the KCL test CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

<u>PON</u>	<u>Service Order #</u>	<u>Account #</u>	<u>Invoice Date</u>
441R214PTJ000001	CPN4C877	706Q858252252	9/5/00
602R214PEJ100001	CPD989B5	706Q858252252	9/5/00
432R214PEJ000001	TPQM7346	706Q858252252	10/5/00
625R214PTJ000003	CPTMH685	706Q858252252	10/5/00
440R124PEJ000003	CPNKJ648	706Q858252252	10/5/00
422R114PEJ000001	NPCPBHP7	706Q893707707	10/19/00
444R214PTJ100003	DPD77KY0	706Q858252252	10/5/00
423R114PTJ100001	NPC3KKX8	706Q893707707	10/19/00
435R114PTJ000013	FPW47666	706Q858252252	11/5/00
435R114PTJ000013	TPW47666	706Q858252252	11/5/00

### **Impact**

Issuing bills containing incorrectly rated or missing charges will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

### **BellSouth Response**

#### Incorrectly Rated Charges

**USOC NPU:** This USOC is one for which CLECs get a resale discount under the provisions of the resale agreements (even when they appear on UNE accounts). For

## BELLSOUTH'S RESPONSE TO EXCEPTION 124

KPMG, the discounts are 20.30% for residence accounts and 17.30% for business accounts. Given a \$3.50 tariff rate, the rates which should be included on KPMG's bill are \$2.79 for residence and \$2.89 for business. In addition, several accounts that KPMG established during the test were set in a "suspended" status. As specified in the Georgia General Subscriber Service Tariff (GSST A2.3.16.B.1a) the appropriate rate to charge for suspended service is 50% of that which normally would be charged to the customer. Therefore, for suspended accounts, USOC NPU would be charged \$1.40 for residence and \$1.45 for business.

The terms and conditions for rates to be charged for resale products are covered in the appropriate resale sections of the CLEC contracts. In general, the resale provisions list those exclusions from BellSouth telecommunications services that are not discounted. Since non-published listings (USOC NPU) are not on the exclusions list, then the CLEC should expect that they will be discounted when ordered.

On reviewing the accounts established for KPMG it was noted that a small number of accounts are being charged the full tariff rate for NPU. This was caused when the changes were made in March, 2000 to begin discounting this USOC for resale on UNE accounts. On March 13, 2000 a rate change program to reflect the discounted rates on existing accounts was not completely executed. The UNE residence accounts were not changed. This oversight was corrected with a second rate change on December 6, 2000.

**USOC SOMEK:** In early August 2000, the rate data base staff updated the new contract rates for KPMG with an effective date of July 27, 2000. Due to an oversight, USOC SOMEK was excluded from this update. Since the rate was not in the CRIS rating tables, the rating process defaulted to zero. This activity appeared on the *UNE Account Report* created as a control mechanism to indicate situations whereby rates on service orders are missing from specific contracts (See "Interim Process" described in BellSouth's reply to KPMG Exception 16). Although SOMEK appeared on the daily report, no further investigation was undertaken because an assumption was made that the billing portion of the Georgia test was completed and that a change to the rating tables would be of no value.

## BELLSOUTH'S RESPONSE TO EXCEPTION 124

The service order edit described in BellSouth's Response to KPMG Exception 16 will be installed in all BellSouth processing sites following the schedule outlined below:

Miami	December 15, 2000
Alabama	December 15, 2000
Ft. Lauderdale	December 21, 2000
Jacksonville	December 21, 2000
Georgia	December 21, 2000
Kentucky	January 3, 2001
Louisiana	January 3, 2001
Mississippi	January 3, 2001
North Carolina	January 3, 2001
South Carolina	January 3, 2001
Tennessee	January 3, 2001

USOC SOMAN: KPMG reported that it expected service order FPW47666 to generate the billing of the non-recurring charge for the USOC SOMAN. This order is one of a pair" of orders issued to complete a number change for KPMG. This type of event would give rise to one OSS charge to be billed. The companion order (TPW47666) contained USOC SOMEK instead of SOMAN. No OSS charge should have been expected for order FPW47666.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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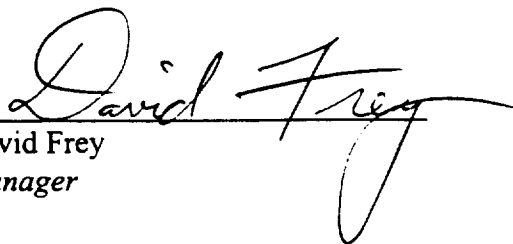
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January 16, 2001

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**RECEIVED**

JAN 16 2001

**EXECUTIVE SECRETARY  
G.P.S.C.**

**RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U**

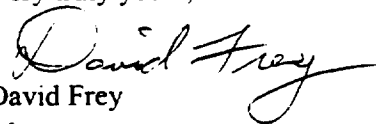
Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's *Transaction Response Timeliness Evaluation Methodology* document.

We request that this document be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

  
David Frey  
Manager

Enclosures

cc: Parties of Record



Date: January 16, 2000

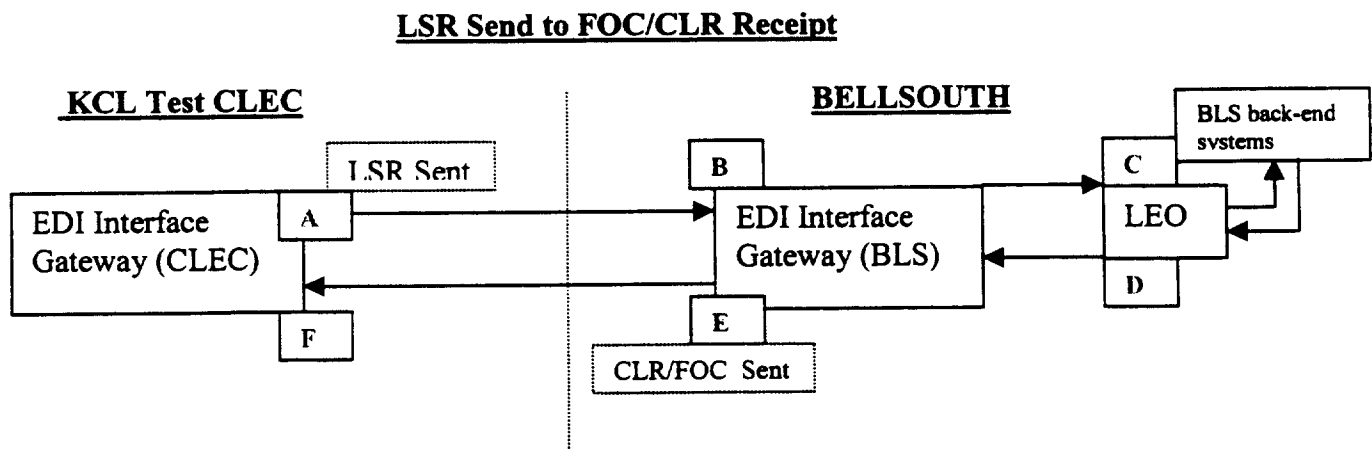
**BellSouth – Georgia Third Party Test:**  
**Transaction Response Timeliness Evaluation Methodology**

Service Quality Measurements (SQMs) are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission (GPSC), BellSouth publishes performance measurement reports of SQM values for both its own retail customers and for the CLECs engaged in business activity with BellSouth in the state of Georgia. BellSouth's SQM manual defines the data points BellSouth utilizes in calculating each SQM.

On June 6, 2000, the GPSC outlined a set of evaluation measures and corresponding standards or benchmarks to be used for the purpose of this Third Party Test. While the measures and standards specified in the June 6 document define specific SQMs, KPMG Consulting (KCL) understands the GPSC intended that KCL use, where possible, test CLEC measurement points to evaluate BellSouth OSS performance as part of the functional evaluations. This is consistent with the methodology KCL applies in other jurisdictions in which it is conducting functional tests<sup>1</sup>. Test CLEC timestamps and data points used by KCL differ in some cases from the BellSouth data points used to calculate specific SQMs.

The intent of the functional evaluations is to replicate the CLEC perspective – using information provided to the CLEC within actual response files and timestamps obtained from CLEC interfaces – in order to offer an independent evaluation of BellSouth performance.

A sample representation of differences between KCL Test CLEC data measurement points and BellSouth data measurement points for the same ordering event is presented below:



<sup>1</sup> Functional tests in Georgia include PRE-1; O&P-1; O&P-2; and PO&P-11.

KCL calculates CLR and FOC response timeliness in the following manner:

- Date/Time CLR/FOC Received by CLEC Interface (e.g., EDI) Gateway minus Date/Time LSR Sent by CLEC Interface Gateway (i.e., Data Point F – Data Point A)

According to the BellSouth SQM Manual, BellSouth calculates CLR Response Timeliness (Reject Interval metric) in the following manner<sup>2</sup>:

- Date/Time CLR sent from LEO minus Date/Time LSR Received by BLS Interface Gateway (i.e., Data Point D – Data Point B)

According to the BellSouth SQM manual, BellSouth calculates FOC Response Timeliness in the following manner<sup>3</sup>:

- Date/Time FOC returned to CLEC (BLS Interface Gateway timestamp) minus Date/Time LSR Received by BLS Interface Gateway (i.e., Data Point E – Data Point B)<sup>4</sup>

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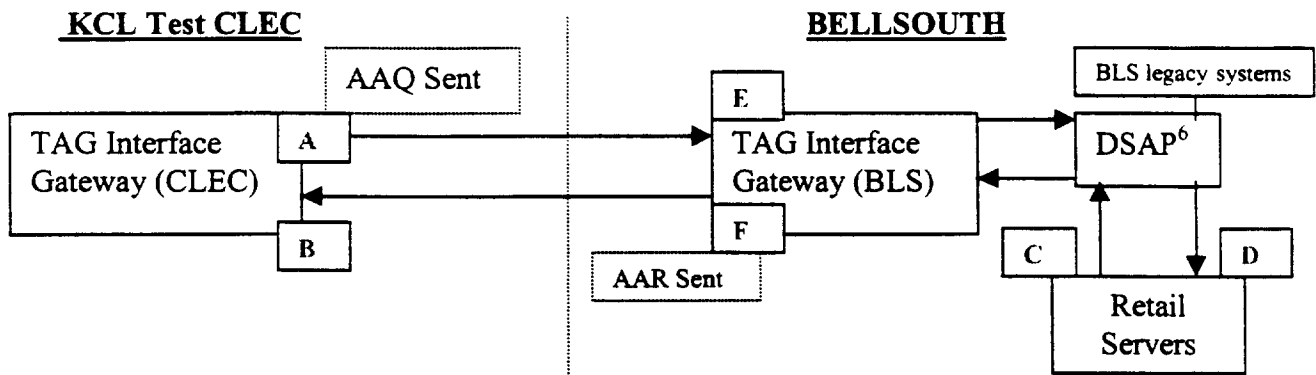
<sup>2</sup> The business rules from the SQM manual define CLR Timeliness (Reject Interval) as follows: Fully Mechanized – The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS, or TAG) until the LSR is rejected (date and time stamp of reject in LEO). Auto Clarifications are considered in the Fully Mechanized category. Partially Mechanized – The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS, or TAG) until it falls out for manual handling. The stop time on partially mechanized LSRs is when the LCSC Service Representative clarifies the LSR back to the CLEC via LEO.

<sup>3</sup> The business rules from the SQM manual define FOC Timeliness as follows: Fully Mechanized – The elapsed time from receipt of a valid electronically submitted LSR (date and time stamp in EDI, LENS, or TAG) until the LSR is processed, appropriate service orders are generated and a Firm order Confirmation is returned to the CLEC. Partially Mechanized – The elapsed time from receipt of a valid electronically submitted LSR that falls out for manual handling until appropriate service orders are issued by a BST service representative via Direct Order Entry (DOE) or Service Order Negotiation Generation System (SONGS) to SOCS and a Firm Order Confirmation is returned to the CLEC.

<sup>4</sup> BellSouth currently produces this metric using LEO timestamps instead of BellSouth interface timestamps, which KCL believes to be inconsistent with the approved SQM definition. See Exception 122 for additional information on this issue.

A sample representation of differences between KCL Test CLEC data measurement points and BellSouth data measurement points for the same pre-ordering event is presented below:

**Pre-Order Query Send to Response Receipt (AAQ<sup>5</sup> Example)**



KCL calculates pre-order response timeliness in the following manner:

- Date/Time Pre-Order Response received by CLEC TAG Interface Gateway minus Date/Time Pre-Order Query sent by CLEC TAG Interface Gateway (i.e., Data Point B – Data Point A)

The GPSC standard for pre-order response timeliness is parity with BellSouth retail performance. BellSouth retail pre-order timeliness is calculated in the following manner:

- Date/Time Pre-Order response received by BLS Retail Servers minus Date/Time Pre-Order query sent by BLS Retail Servers (Data Point D – Data Point C)

A comparison of KCL Test CLEC pre-order response intervals to BellSouth retail pre-order response time does not account for any CLEC – to – ILEC transmission time (i.e., intervals between Data Points E and A, and between F and B).<sup>7</sup>

In its June 6 order, the GPSC specifies benchmarks and standards to be used by KCL in evaluating BellSouth's performance. It is important that all parties referencing KCL's analysis (when published) understand that KCL is applying the GPSC's specified standards/benchmarks (e.g., 95% within 3 hours for FT FOCs in the case of orders, parity with retail in the case of pre-orders) to KCL Test CLEC measurements points, and not to the BellSouth internal measurement points specified in the SQM definitions. As such, factors contributing to potential differences in the response interval, such as Test CLEC interface to BellSouth interface transmission time, are not accounted for.

<sup>5</sup> AAQ = Appointment Availability Query

<sup>6</sup> AAQ pre-order inquiries are routed to BellSouth's DSAP system for processing.

<sup>7</sup> In some states, a "parity + X seconds" standard has been established to account for the discrepancy between internal retail server transmission intervals and external wholesale interface transmission intervals.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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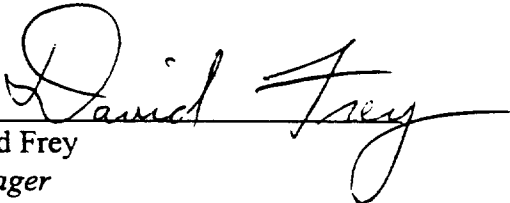
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Manager

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RECEIVED

JAN 26 2001

EXECUTIVE SECRETARY  
G.P.S.C.

January 26, 2001

Ms. Helen O'Leary  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street  
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U**

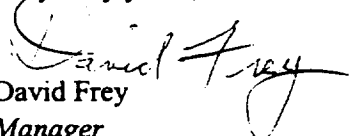
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Thank you for your assistance in this regard.

Very truly yours,

  
David Frey  
Manager

Enclosures

cc: Parties of Record





## **1.0 Document Objective**

In this document, KPMG Consulting LLC (KCL) provides a summary interim status report on developments related to the BellSouth-GA OSS Test. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A detailed report on specific Master Test Plan (MTP) items is provided in the table in section 4.0. A detailed report on specific Supplemental Test Plan (STP) items is provided in the table in section 5.0. Each item presented in the tables in sections 4.0 and 5.0 includes a reference number that identifies the item from a previous status report, where applicable. A detailed report on exceptions is provided in the table in section 6.0.

## **2.0 Key Developments**

- Performance measurement reporting (Metrics):
  - MTP: KCL has completed its update of the programs for calculation validation to apply to the October and November SQM values for the KCL test CLEC. KCL is currently updating its programs to apply to the December SQM values for the test CLEC.
  - MTP: KCL continues the following testing activities: 1) Calculation of PMAP-generated and manually-generated SQM values for the test CLEC; 2) Comparison of KCL-generated data to corresponding data provided by BellSouth.
- Ordering:
  - KCL has initiated a second ordering functional re-test designed to evaluate a number of open exceptions.

## **3.0 Key Upcoming Activities**

- KCL expects to continue to focus efforts on: 1) exception re-testing and closure activities; and 2) drafting and reviewing the MTP and STP reports.

#### 4.0 Master Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-6	EDI functional testing	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to EDI functional testing, that remain open: Exceptions 26, 38, 39, 47, 68, 71, 77, 78, 95, 98, 118, &amp; 125. KCL is internally reviewing closure reports for Exceptions 26, 47, &amp; 95. The GPSC is reviewing a closure report for Exception 39. KCL is clarifying a closure report for Exception 38, regarding Ordering and Provisioning, based on comments received by the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL initiated a second ordering functional re-test on January 19, 2001.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KCL will analyze re-test transactions and employ the results to evaluate a number of open exceptions.</li> </ul>
		<ul style="list-style-type: none"> <li>A number of transactions from KCL's first functional re-test failed to receive Completion Notices (CNs).</li> </ul>	<ul style="list-style-type: none"> <li>KCL and BLS have determined transactions to be missing CNs for several reasons: 1) BLS representatives mistakenly cancelled service orders residing in a post-FOC error status (due to billing or listing downstream errors); and 2) other BLS representative errors. There were some cases for which BLS was unable to locate the relevant PONs.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to continue to examine CN receipt during the second ordering functional re-test.</li> </ul>

**BellSouth-GA OS Testing Evaluation**  
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<p>1-7</p> <p>TAG functional testing</p>	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to TAG functional testing, that remain open: Exceptions 26, 38, 39, 47, 68, 71, 77, 78, 95, 98, 118, &amp; 125. KCL is internally reviewing closure reports for Exceptions 26, 47, &amp; 95. The GPSC is reviewing a closure report for Exception 39. KCL is clarifying a closure report for Exception 38 based on comments received by the GPSC.</li> <li>KCL initiated a second ordering functional re-test on January 19, 2001.</li> <li>A number of transactions from KCL's first functional re-test failed to receive Completion Notices (CNs).</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> <li>None.</li> <li>KCL and BLS have determined transactions to be missing CNs for several reasons: 1) BLS representatives mistakenly cancelled service orders residing in a post-FOC error status (due to billing or listing downstream errors); and 2) other BLS representative errors. There were some cases for which BLS was unable to locate the relevant PONs.</li> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> <li>KCL will analyze re-test transactions and employ the results to evaluate a number of open exceptions.</li> <li>KCL expects to continue to examine CN receipt during the second ordering functional re-test.</li> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
<p>Pre-Order Functional Testing</p>	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to Pre-Order functional testing, that remain open: 24, 71, &amp; 116. KCL is clarifying a closure report for Exception 116 based on comments received by the GPSC. KCL is internally reviewing a closure report for Exception 24.</li> </ul>		

Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>In response to a previously-identified issue regarding a discrepancy between the service interval obtained from BLS documentation for a Directory-Listing related request versus the interval obtained from CDD pre-order queries, BLS responded that Directory Listing requests contain a 0 day interval and do not require CDD inquiries. BLS updated its <i>Product and Services Interval Guide</i> documentation in December to reflect this interval.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
1-8	CRIS/CABS Invoicing Functional Test	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to CRIS/CABS invoicing functional testing, that remain open: Exception 16, 35 &amp; 124.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
11-1	Metrics	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to Metrics (MTP - Performance Measures evaluations) that remain open: Exceptions 113, 119, 120 and 123. Additionally, KCL submitted three draft exceptions to BLS that will be publicly issued if the information is substantiated by the BLS response.</li> <li>KCL is completing its update of the calculation validation programs to apply to December SQM values for the KCL Test CLEC.</li> <li>KCL continues to compare the transaction data generated and collected by the KCL Test CLEC to data reported by BLS.</li> </ul>	<ul style="list-style-type: none"> <li>The issues related to exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> <li>KCL anticipates identifying issues, if any, during the week of January 29, 2001</li> <li>KCL has identified issues to BLS via draft exceptions.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> <li>If KCL identifies any discrepancies, KCL will bring them to the attention of BLS via the exception process.</li> <li>KCL will continue testing and exception re-testing activities.</li> </ul>

**BellSouth-GA OS Testing Evaluation**  
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Ref	Item	Status	Issues	Next Step/Resolution
II-4	Volume Test	<ul style="list-style-type: none"> <li>Volume testing activities have been completed. KCL has no open exceptions related to these evaluations.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
II-5	Change Management (CM-1)	<ul style="list-style-type: none"> <li>The published <i>Change Control Process (CCP)</i>, dated 8/23/00, is operational and is being used by CLECs and BLS. KCL is continuing to observe enhancements and changes to the published <i>Change Control Process</i>.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KCL is continuing to monitor BLS/CLEC use of the published <i>Change Control Process</i>, which includes following proposed and pending change requests (CRs), and observing change control conference calls and meetings.</li> </ul>
III-1	Flow-Through Evaluation	<ul style="list-style-type: none"> <li>KCL continues to re-test issues related to the Re-Opening of Exception 21.</li> </ul>	<ul style="list-style-type: none"> <li>The issues related to exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
IV-3	ODUF/ADUF usage functional test	<ul style="list-style-type: none"> <li>KCL issued the following exception related to ODUF/ADUF usage functional testing that remains open: Exception 28. The GPSC is currently reviewing a closure report for Exception 28.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
V-2	Provisioning Verification	<ul style="list-style-type: none"> <li>KCL issued the following exceptions related to Provisioning Verification that remain open: 76 &amp; 106. KCL is clarifying a closure report for Exception 106 based on comments received by the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exception is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
V-3	Pre-ordering, Ordering and Provisioning Documentation Review	<ul style="list-style-type: none"> <li>There are no open exceptions related to the Pre-Ordering, Ordering and Provisioning Documentation Review.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL's <i>Documentation Issues Log</i> contains five active issues. Four of these issues are pending resolution. BLS continues to research one issue.</li> </ul>	<ul style="list-style-type: none"> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to continue to work with BLS to identify and resolve outstanding documentation deficiencies.</li> </ul>

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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>BLS issued a new version of the <i>Product and Services Interval Guide</i> in December.</li> </ul>	<ul style="list-style-type: none"> <li>Upon reviewing this document, KCL noted that intervals for several order Activity Types related to Issue 7 of the BLS electronic interfaces were missing.</li> </ul>	<ul style="list-style-type: none"> <li>BLS plans to issue an amended version of this documentation. In the interim, KCL will utilize the intervals associated with the Issue 9 Activity Types for the corresponding Issue 7 Activities. Upon release, KCL will review the updated documentation to verify that intervals for all Issue 7 Activity Type codes have been included.</li> </ul>

### 5.0 Supplemental Test Plan Specific Item Status

Ref	Item	Status	Issues	Next Step Resolution
VII-4	Metrics	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to Metrics (STP - Performance Measures evaluations) that remain open: Exceptions 79, 86, 89, 92, 93, and 122. KCL is reviewing a closure report for Exception 92 internally. KCL is awaiting comments on a closure report for Exceptions 93 from the GPSC. KCL has submitted a draft exception to BLS that summarizes potential issues that arose as a result of testing related to the GPSC's June 6<sup>th</sup> Order. KCL will publicly issue this draft exception if the information is substantiated by the BLS response.</li> <li>KCL continues the following testing activities: 1) Calculation of PMAP-generated and manually-generated SQMs for the CLEC aggregate and BLS retail; 2) Comparison of early stage data to raw data.</li> </ul>	<ul style="list-style-type: none"> <li>The issues related to exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> <li>KCL has identified issues and prepared exceptions related to these activities.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> <li>KCL will continue testing and exception re-testing activities.</li> </ul>
IX-2	PO&P11 - EDI & TAG Resale Functional Evaluation	<ul style="list-style-type: none"> <li>KCL issued the following exceptions related to EDI &amp; TAG resale functional testing, that remain open: Exceptions 26, 38, 60, 68, 71, 77, 78, 95, 98, 116, &amp; 125. KCL is internally reviewing closure reports for Exceptions 26 &amp; 95. KCL is clarifying closure reports for Exception 38 &amp; 116 based on comments received from the GPSC.</li> <li>KCL initiated a Resale functional re-test on January 19, 2001.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> <li>KCL will analyze re-test transactions and employ the results to evaluate a number of open exceptions.</li> </ul>

**BellSouth-GA OS Testing Evaluation**  
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Ref	Item	Status	Issues	Next Step/Resolution
IX-3	PO&P12 - xDSL Functional Evaluation	<ul style="list-style-type: none"> <li>In response to a previously-identified issue related to inaccurate FOCs in response to Resale orders, KCL issued an amended version of Exception 95.</li> <li>KCL issued the following exceptions, related to xDSL functional testing that remain open: Exceptions 112, 115, 117 and 121. In addition, KCL submitted two draft exceptions to BLS. KCL is reviewing BLS responses to three draft exceptions.</li> <li>On January 3, 2001, KCL submitted test bed specifications to BLS for an xDSL functional evaluation re-test. Having received some of the necessary CSRs, KCL commenced submission of xDSL pre-order queries on January 22, 2001.</li> </ul>	<ul style="list-style-type: none"> <li>For several transactions, KCL submitted requests for Directory Listing changes using an incorrect Requisition Type.</li> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> <li>None.</li> </ul>	<ul style="list-style-type: none"> <li>In response to this amended exception, BLS has submitted a Change Request for prioritization and implementation in a future software release. This change request proposes a system edit that will return an appropriate error message. An implementation date for this change request has not been established. As a result, KCL will not have the opportunity to re-test this system fix. KCL expects to draft a closure statement for Exception 95.</li> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> <li>KCL is awaiting receipt of additional CSRs to continue re-testing activity.</li> </ul>
	PO&P-13 - Provisioning Verification Evaluation - Resale and xDSL	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to the Provisioning Verification Evaluation - Resale and ADSL that remain open: Exception 114 &amp; 126. KCL is clarifying a closure report for Exception 114 based on GPSC comments. KCL expects to issue Exception 126 shortly.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
IX-6	PO&P16 - xDSL Process Parity	<ul style="list-style-type: none"> <li>KCL issued the following exception, related to xDSL process parity test that remains open: Exception 108.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>
IX-9	BLG7 - CRIS Resale Invoicing Functional Evaluation	<ul style="list-style-type: none"> <li>KCL issued the following exceptions, related to the CRIS Resale Invoicing Functional Evaluation that remain open: Exceptions 99 &amp; 103.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>



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Ref	Item	Status	Issues	Next Step Resolution
IX-10	BLG8 – Resale Usage Functional Evaluation	<ul style="list-style-type: none"> <li>KCL issued the following exception, related to EDI functional testing, that remains open: Exception 94. KCL is clarifying a closure report for Exception 94 based on comments received by the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>The status of exceptions and draft exceptions is detailed in <i>Section 6.0 Exceptions Status</i>.</li> </ul>	<ul style="list-style-type: none"> <li>All exceptions must be closed for purposes of the test before reports can be finalized.</li> </ul>

### 6.0 Exceptions<sup>2</sup> Status

Ref	Item	Status	Issues	Next Step/Resolution
IV-5	<p><b>Exceptions</b></p> <ul style="list-style-type: none"> <li>KCL expects to file a closure report for Exception 9, regarding Ordering &amp; Provisioning, with the GPSC shortly. Of the service requests reviewed by KCL following implementation of Feature 5183, none exhibited occurrences of missing or faxed FOC and CN responses due to BLS error. While KCL cannot prove that the absence of missing or faxed FOC and CN responses is a direct result of the implementation of Feature 5183, the evidence suggests that such a conclusion is reasonable. In closing this exception, KCL notes that relative to the total number of test transactions submitted electronically, faxed responses were received for less than one percent of service requests submitted during the initial test.</li> </ul>	<ul style="list-style-type: none"> <li>KCL is engaged in re-testing activities for Exception 16, regarding Billing.</li> <li>KCL continues to conduct re-testing activities related to Exception 21 (Re-opened), regarding Flow-Through.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS failed to deliver Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is engaged in re-testing activities for Exception 16, regarding Billing.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS issued multiple bills containing erroneous information to KCL.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL continues to conduct re-testing activities related to Exception 21 (Re-opened), regarding Flow-Through.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that, based on subsequent testing activities, the change implemented by BLS does not properly classify "Z" processing status LSRs for the purposes of the Flow Through Report.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>

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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 23, regarding Metrics, with the GPSC on 01/05/01. As a result of clarifications made by BLS to KCL personnel, review and use of documentation updated by BLS, and changes in metric calculations by BLS as appropriate depending on the issue in question, KCL believes that BLS has adequately addressed the issues identified in Exception 23. However, KCL did submit an observation to BLS noting that BLS's internal quality assurance processes had not detected any of the problems or errors identified in this exception and Exception 70 until KCL brought them to BLS's attention. BLS responded that it was developing a formal Performance Measurements Quality Assurance Plan to address the issues identified in the observation.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that it cannot replicate five of BLS's reported Service Quality Measurements.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing a closure report for Exception 24, regarding Ordering and Provisioning, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS's TAG API does not deliver timely responses to pre-order transactions.</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing a closure report for Exception 26, regarding Ordering and Provisioning, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not deliver timely Completion Notices (CNs).</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is clarifying a closure report for Exception 28, regarding Billing, based on comments received by the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>Second Amended Exception: BLS failed to deliver DUF records for six percent (6%) of the second retest calls for which records were expected. Amended Exception: KCL indicated that BLS failed to deliver DUF records for twenty-seven percent (27%) of the re-test calls for which records were expected. Initial Exception: KCL indicated that BLS failed to deliver 46% of expected DUF records to KCL.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon completion.</li> </ul>

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Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>KCL expects to file a closure report for Exception 31, regarding Ordering &amp; Provisioning, with the GPSC shortly. KCL received FOCs for all separate service requests for Loop Service and Directory Listings, indicating that BLS ordering systems successfully processed the requests. In addition, KCL did not experience problems obtaining the same confirmed Due Date for DL service as the Due Date received for corresponding Loop Service requests. While BLS electronic ordering systems do not have the ability to handle Loop Service with DL orders on a single LSR, the basic functionality to process these orders does exist. KCL believes that the additional effort required to develop two distinct service requests and to coordinate their Due Dates is not a significant impediment to a CLEC's ability to execute these order types.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS's electronic ordering systems do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL expects to issue a Statement of Re-Opening for Exception 35, regarding Billing, shortly.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS issued multiple bills containing erroneous charges to KPMG Consulting LLC (KCL).</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is clarifying a closure report for Exception 38, regarding Ordering and Provisioning, based on comments received by the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not consistently provide CLECs with a service Due Date matching their Desired Due Date.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon the completion.</li> </ul>
		<ul style="list-style-type: none"> <li>The GPSC is reviewing KCL's closure report for Exception 39, regarding Ordering and Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS's electronic ordering systems do not provide the functionality required for submitting partial migrations to UNE loops.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to file this closure statement upon completion of the GPSC's review.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 46, regarding Metrics, with the GPSC on 12/14/00. As a result of clarifications made by BLS to KCL personnel, review and use of documentation updated by BLS, and changes in metric calculations by BLS as appropriate depending on the issue in question, KCL believes that BLS has adequately addressed the issues identified in Exception 46.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that it can not replicate seven of BLS's reported Service Quality Measurements.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing a closure report for Exception 47, regarding Ordering &amp; Provisioning, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS delivered inaccurate partially-mechanized CLR's.</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC.</li> </ul>

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Ref	Item	Status	Issues	Next Step Resolution
	<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 57, regarding xDSL, with the GPSC on 01/05/01. Based on its review of BLS's Loop Make-Up CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup documentation as posted on the BLS website, KCL concluded that BLS provides adequate guidelines for submitting xDSL pre-order Service Inquiry for Loop Make-Up.</li> </ul>	<ul style="list-style-type: none"> <li>KCL is performing re-testing activities related to Exception 60, regarding Ordering and Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS guidelines for submitting xDSL pre-order Service Inquiry (SIs) for Loop Make-Up (LMU) information do not exist.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is performing re-testing activities related to Exception 60, regarding Ordering and Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KCL is performing re-testing activities related to Exception 60, regarding Ordering and Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not deliver timely Functional Acknowledgements (FAs) via Electronic Data Interchange (EDI).</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 61, regarding Metrics, with the GPSC on 01/05/01. With several exceptions among the Provisioning SQMs, KCL confirmed that all of the levels of disaggregation that BLS indicated in the September 2000 SQM manual were actually listed as categories in the SQM reports, and were being reported upon. The remaining discrepancies were resolved via updates included in the November 2000 SQM manual. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 61.</li> </ul>	<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 61, regarding Metrics, with the GPSC on 01/05/01. With several exceptions among the Provisioning SQMs, KCL confirmed that all of the levels of disaggregation that BLS indicated in the September 2000 SQM manual were actually listed as categories in the SQM reports, and were being reported upon. The remaining discrepancies were resolved via updates included in the November 2000 SQM manual. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 61.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that for certain Service Quality Measurements (SQMs), BLS does not report values at all levels of disaggregation specified in the Service Quality Measurements Georgia Performance Report 10/22/99 (SQM Reports).</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>

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Ref <sup>1</sup>	Item	Status	Issues	Next Step Resolution
	<ul style="list-style-type: none"><li>KCL filed a closure report for Exception 66, regarding Pre-Ordering, with the GPSC on 01/05/01. KCL believes the response completeness issues initially identified in this Exception resulted from a misinterpretation of the relationship between response fields identified within the TAG API Reference Guide and those documented in the Pre-Order Business Rules. Perceived discrepancies between the API Guide and Business Rules were addressed and resolved within Exception 63 (see Exception 63 for additional information on this issue). KCL initiated Exception 66 re-test activities following resolution of documentation discrepancies, and used the Business Rules as the sole source for expected response data. Based on these re-test activities, KCL verified that pre-order responses contained complete information relative to the requirements documented in BLS's Pre-Order Business Rules.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that BLS does not provide complete pre-order responses via the TAG interface.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>
	<ul style="list-style-type: none"><li>KCL will review revisions to BLS's <i>LEO Guide</i> (targeted for release at the end of January) as it relates to issues pertaining to Exception 68, regarding Ordering and Provisioning.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that BLS does not provide complete Firm Order Confirmation (FOC) and Completion Notice (CN) responses.</li></ul>	<ul style="list-style-type: none"><li>KCL's further activities will be based on its review of BLS's <i>LEO Guide</i>.</li></ul>

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Ref <sup>1</sup>	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"><li>KCL filed a closure report for Exception 70, regarding Metrics, with the GPSC on 01/05/01. The BLS Issues Management and Change Control Plan has been updated, and members of the team retrained. The legacy system owners are aware of the Performance Measurement Group and its requirements for support. Additionally, the communication/notification process has been enhanced. However, KCL did issue an observation to BLS noting that BLS's internal quality assurance processes had not detected any of the problems or errors identified in this exception and Exception 23 until KCL brought them to BLS's attention. BLS responded that it was developing a formal Performance Measurements Quality Assurance Plan to address the issues identified in the observation document. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 70.</li></ul>	<ul style="list-style-type: none"><li>KCL indicated that BLS does not have an adequate change management process for the generation of Service Quality Measurement (SQM) data from its legacy/source systems.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>
		<ul style="list-style-type: none"><li>KCL is awaiting an amended response from BLS for Exception 71, regarding Ordering and Provisioning.</li></ul>	<ul style="list-style-type: none"><li>KCL indicated that the service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the BLS <i>Product and Services Interval Guide</i>.</li></ul>	<ul style="list-style-type: none"><li>KCL's further activities will be based upon BLS's amended response.</li></ul>
		<ul style="list-style-type: none"><li>KCL filed a closure report for Exception 74, regarding Metrics, with the GPSC on 01/05/01. KCL confirmed that all of the levels of disaggregation that BLS indicated in the May 2000 SQM manual were actually listed as categories in the SQM reports, and were being reported upon, if appropriate. Note that because the KCL test CLEC did not issue trunk orders, and did not issue every type of transaction for every month, it is not appropriate to expect there to be values for all categories in the test CLEC's SQM reports, for every month. As a result of the review activities, KCL believes that BLS has adequately addressed the issues identified in Exception 74.</li></ul>	<ul style="list-style-type: none"><li>KCL indicated that BLS does not report certain Georgia Service Quality Measurements at the levels of disaggregation specified in the Service Quality Measurements Georgia Performance Reports.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>

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Ref	Item	Status	Issues	Next Step Resolution
	<ul style="list-style-type: none"> <li>KCL issued Exception 76 (4<sup>th</sup> Amended), regarding Ordering and Provisioning.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that it encountered numerous BLS provisioning errors for UNE orders.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on BLS's response to the amended exception.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is performing re-testing activities related to Exception 77, regarding Ordering and Provisioning.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS does not deliver timely fully mechanized Clarification (CLR) responses.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is performing re-testing activities related to Exception 78, regarding Ordering and Provisioning.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs).</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL issued Exception 79 (2<sup>nd</sup> Amended), regarding Metrics, based on discussions with the GPSC and BLS.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP).</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on BLS's response to the amended exception.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL expects to file an addendum to the closure report for Exception 81, regarding Maintenance &amp; Repair, with the GPSC shortly. Subsequent to the filing of the Closure Report BLS elected to bring the issue to the CLEC community via the Change Control Process, and to make the programming changes if the CLECs requested them. At the October 25, 2000 Change Control Meeting, the CLEC community did not prioritize ECTA attribute validation, therefore BLS cancelled this specific item as an issue to be addressed. While the lack of data validation limits the functionality of the interface, CLECs have been given an appropriate opportunity to address the issue via the Change Control process and have elected not to proceed with changes to the ECTA Gateway. Therefore, KCL is amending its original judgment in the July 21, 2000 Closure Report, and as such will assign a "Satisfied" result for the criterion relating to Exception 81.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that the ECTA Gateway does not notify CLECs when invalid information is entered into a trouble ticket.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>



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	<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 83, regarding Metrics, with the GPSC on 01/05/01. Based upon its review, KCL developed the following conclusions for each issue:  <i>Billing – Invoice Accuracy</i> <ul style="list-style-type: none"> <li>KCL found the changes BLS made to the queries used to extract the June 2000 Raw Billing Data to be consistent with the documented calculation method and the stated intent of the Invoice Accuracy metric.</li> </ul> <i>Billing – Mean Time to Deliver Invoices</i> <ul style="list-style-type: none"> <li>KCL found the changes BLS made to the July 2000 SQM to be consistent with the documented calculation method and the stated intent of the Mean Time to Deliver Invoices metric.</li> </ul> </li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that exclusions listed in the "Exclusions" section of the SQM Georgia Performance Reports are not correctly applied when creating raw data or calculating SQMs.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
	<p>As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 83.</p> <ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 84, regarding Metrics, with the GPSC on 01/05/01. Upon re-testing, KCL found that the changes made by BLS to the SQM manuals for the months of May 2000 and/or July 2000 to be consistent with the documented calculation method for each of the issues identified. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 84.</li> <li>KCL continues re-testing activities for issues pertaining to Exception 86, regarding Metrics.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that the information in the SQM Georgia Performance Reports is inconsistent with the computational instructions provided by BLS for five SQMs.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
			<ul style="list-style-type: none"> <li>KCL indicated that it cannot replicate six of BLS's reported Service Quality Measurements (SQMs).</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>

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Ref	Item	Status	Issues	Next Step Resolution
	<ul style="list-style-type: none"> <li>KCL filed a closure report for Exception 87, regarding Metrics, with the GPSC on 01/05/01. Upon re-testing, KCL found that the changes made by BLS to the SQM manuals for the months of May 2000 and/or July 2000, and changes made to the <i>May Raw Data Users Manual</i> to be consistent with the documented calculation method for each of the issues identified. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 87.</li> </ul>	<ul style="list-style-type: none"> <li>KCL continues to investigate issues pertaining to Exception 89, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS incorrectly billed KCL for usage charges for messages processed in the Augusta central office.</li> </ul>	<ul style="list-style-type: none"> <li>N/A.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is reviewing a closure report for Exception 92, regarding Metrics, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS's raw data used in the calculation of BLS SQM reports are not accurately derived from or supported by their early-stage data.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the results of its investigation.</li> </ul>	
	<ul style="list-style-type: none"> <li>The GPSC is reviewing a closure report for Exception 93, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS's raw data, reports, are not accurately derived from or supported by their component early-stage data.</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC for review and comment.</li> </ul>	
	<ul style="list-style-type: none"> <li>KCL is clarifying a closure report for Exception 94, regarding Billing, based on comments made by the GPSC.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that it encountered ten Service Quality Measurements (SQMs) for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the <i>Service Quality Measurements Georgia Performance Reports (SQM Reports)</i>.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to file this closure statement upon completion of the GPSC's review.</li> </ul>	
	<ul style="list-style-type: none"> <li>KCL is reviewing a closure report for Exception 95, regarding Ordering and Provisioning, internally.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS failed to deliver 20% of expected resale DUF records to KCL.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon completion of its clarifications.</li> </ul>	
	<ul style="list-style-type: none"> <li>KCL continues to investigate issues relating to Exception 98, regarding Ordering and Provisioning.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS has delivered Firm Order Confirmations (FOCs) in response to Local Service Requests (LSRs) that should have received error messages.</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC for review and comment.</li> </ul>	
		<ul style="list-style-type: none"> <li>KCL indicated that BLS does not deliver timely partially mechanized Clarification (CLR) responses.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based upon the results of its investigation.</li> </ul>	

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Ref	Item	Status	Issues	Next Step Resolution
	<ul style="list-style-type: none"> <li>KCL expects to issue a Statement of Re-Opening for Exception 99, regarding Billing, shortly. After a closure report was filed, BLS submitted an Amended Response to Exception 99. KCL reviewed this new information and expects to file a Statement of Re-Opening for Exception 99. KCL expects to conduct re-testing activities related to BLS's amended response.</li> </ul>	<ul style="list-style-type: none"> <li>KCL is performing re-testing activities related to Exception 103, regarding Billing.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS issued multiple bills to the KPMG Consulting (KCL) Test CLEC incorrectly identifying recurring charges as non-recurring charges.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL expects to file a closure report for Exception 105, regarding Metrics, with the GPSC shortly. KCL found the changes BLS made to the August, 2000 calculation instructions to be consistent with the documented calculation method and the stated intent of the Provisioning – Mean Held Order Interval and Distribution Interval metric. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 105.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to file a closure report for Exception 106, regarding Ordering and Provisioning, based on GPSC comments.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that it received invoices from BLS containing inaccurate information.</li> <li>KCL indicated that computation instructions provided by BLS for Provisioning – Mean Held Order Interval and Distribution Intervals are inconsistent with the information provided in the SQM Reports.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> <li>N/A.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL expects to file a closure report for Exception 107, regarding xDSL work center capacity management, with the GPSC shortly. As of November 18, 2000, BLS made the Loop Qualification System (LQS) available to all DLEC/CLEC customers via the appropriate interconnection agreement amendment, as described in the BLS document LQS DLEC/CLEC Job Aid, Issue 1, October 16, 2000. The aforementioned access to LQS and the mechanized LMU service makes it possible for DLEC/CLECs to receive loop availability responses and loop make-up information that demonstrates parity with BLS Internet Service customers in regards to timeliness of response and completeness of information.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon completion.</li> <li>N/A.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS failed to meet the agreed upon Frame Due Time (FDT) for six loop migrations.</li> <li>KCL indicated that parity does not exist between BLS's CLEC xDSL pre-ordering loop qualification process and its retail xDSL ordering process.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon completion.</li> <li>N/A.</li> </ul>

**BellSouth-GA Operating Evaluation  
Interim Status Report  
January 26, 2001**

Ref	Item	Status	Issues	Next Step/Resolution
	<ul style="list-style-type: none"><li>KCL continues to investigate issues pertaining to Exception 108, regarding xDSL.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that parity does not exist between BLS's CLEC xDSL ordering process and its retail xDSL ordering process.</li></ul>	<ul style="list-style-type: none"><li>KCL's further activities will be based upon the results of its investigation.</li></ul>
	<ul style="list-style-type: none"><li>KCL filed a closure report for Exception 110, regarding Metrics, with the GPSC on 01/05/01. Based upon revisions to the SQM manual, revisions to the <i>Raw Data Users Manual</i>, and revised data given to KCL by BLS, KCL was able to match exactly the BLS reported values for all the issues identified. As a result, KCL believes that BLS has adequately addressed the issues in Exception 110.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that it cannot replicate four of BLS's reported SQMs.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>
	<ul style="list-style-type: none"><li>KCL filed a closure report for Exception 111, regarding Metrics, with the GPSC on 01/01/01. When KCL implemented the instructions found in the October 4, 2000 version of the Raw Data User Manual, the resulting calculated values matched the original BLS-reported values. The Raw Data User Manual's computation instructions corresponded to the information in BLS's response above. Further, the values KCL calculated for this SQM subsequent to those posted in the July 2000 report match those reported by BLS, exactly, through September 2000. As a result, KCL believes that BLS has adequately addressed the issues identified in Exception 111.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that it cannot replicate one of BLS's reported SQMs for the month of July 2000.</li></ul>	<ul style="list-style-type: none"><li>N/A.</li></ul>
	<ul style="list-style-type: none"><li>KCL is reviewing a BLS's amended response to Exception 112, regarding xDSL.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that BLS does not have a process for returning acknowledgements or tracking manually-submitted Loop Make-up Service Inquiry pre-order queries or Local Service Request Service Inquiries.</li></ul>	<ul style="list-style-type: none"><li>KCL's further activities will be based on its analysis of BLS's amended response.</li></ul>
	<ul style="list-style-type: none"><li>KCL is reviewing BLS's amended response to Exception 113 (Amended), regarding Metrics.</li></ul>		<ul style="list-style-type: none"><li>KCL indicated that BLS- reported raw data values for Completion Date and Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Service Order numbers for six provisioning metrics.</li></ul>	<ul style="list-style-type: none"><li>KCL's further activities will be based on its analysis of BLS's amended response.</li></ul>

**BellSouth-GA Ongoing Evaluation**  
**Interim Status Report**  
**January 26, 2001**

Ref	Item	Status	Issues	Next Step/Resolution
	<ul style="list-style-type: none"> <li>KCL is clarifying a closure report for Exception 114, regarding Ordering and Provisioning, based on comments received by the GPSC.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that it encountered BLS provisioning errors for Resale orders.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon completion.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is preparing to perform re-testing activities related to Exception 115, regarding xDSL.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS does not respond to Loop Make-Up Service Inquiries within the specified seven-day interval.</li> </ul>	<ul style="list-style-type: none"> <li>KCL will begin re-testing once it has completed preparatory activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is clarifying a closure report for Exception 116, regarding Pre-Ordering, based on comments received from the GPSC.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that version 2.2.0.11 of BLS's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests.</li> </ul>	<ul style="list-style-type: none"> <li>KCL expects to re-submit the closure report to the GPSC upon completion.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL received BLS's amended response to Exception 117, regarding xDSL. KCL is preparing to perform re-testing activities related to this exception.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS did not provide a Clarification/Rejection response to a Loop Make-Up (LMU) Service Inquiry within the specified seven-day interval.</li> </ul>	<ul style="list-style-type: none"> <li>KCL will begin re-testing once it has completed preparatory activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is drafting a closure report for Exception 118, regarding Ordering and Provisioning.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that it did not receive Completion Notices (CNs) within one business day of expected service completion.</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC for review and comment.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is reviewing BLS's amended response to Exception 119, regarding Metrics.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Completion Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on its review of BLS's amended response.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL continues to investigate issues pertaining to Exception 120, regarding Metrics.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data files used in the calculation of three ordering metrics for the KCL Test CLEC incorrectly report certain purchase order numbers and version numbers as non-mechanized orders in August and September 2000.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based upon its investigation of this exception.</li> </ul>

**BellSouth-GA O&T Testing Evaluation**  
**Interim Status Report**  
**January 26, 2001**

Ref	Item	Status	Issues	Next Step/Resolution
	<ul style="list-style-type: none"> <li>KCL is investigating issues related to Exception 121, regarding xDSL.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Completion Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for one provisioning metric.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based upon its investigation of this exception.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is reviewing BLS's response to Exception 122, regarding Metrics.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that Definitions and Business Rules in the <i>Service Quality Measurements Georgia Performance Reports</i> (SQM Reports) are incomplete or inaccurate for the Firm Order Confirmation (FOC) Timeliness and Reject Interval Ordering Service Quality Measurements.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on its review of BLS's response.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is awaiting the release of an updated version of the <i>Raw Data Users Manual</i> in order to perform re-testing activities related to Exception 123, regarding Metrics.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS's raw data is insufficient for calculating the October 2000 <i>Percent Provisioning Troubles within 30 Days of Service Order Activity</i> Service Quality Measurement (SQM) for the KCL Test CLEC.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based upon its review of the updated <i>Raw Data Users Manual</i>.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is performing re-testing related to Exception 124, regarding Billing.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS issued multiple bills that contained incorrectly rated and missing charges.</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based on the outcome of re-testing activities.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL is reviewing a closure report for Exception 125, regarding Ordering and Provisioning, internally.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS's process for generating Completion Dates (CN DDs) for Local Service Requests (LSRs) may result in inaccuracies between the CN DD provided to the CLEC and the actual date of service completion.</li> </ul>	<ul style="list-style-type: none"> <li>After internal review, KCL expects to submit this closure report to the GPSC.</li> </ul>
	<ul style="list-style-type: none"> <li>KCL expects to issue Exception 126, regarding xDSL, shortly.</li> </ul>		<ul style="list-style-type: none"> <li>KCL indicated that BLS's provisioning completion activities for xDSL orders are not consistent with the confirmation due date provided on the Firm Order Confirmation (FOC).</li> </ul>	<ul style="list-style-type: none"> <li>KCL's further activities will be based upon its investigation of this exception.</li> </ul>

**BellSouth-GA Operating Evaluation  
Interim Status Report  
January 26, 2001**

Ref	Item	Status	Issues	Next Step/Resolution
		<ul style="list-style-type: none"> <li>KCL is reviewing BLS's amended response to a Draft Exception, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's amended response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing BLS's response to a Draft Exception, regarding xDSL.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number (RPON) designed with non-designed services.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing BLS's response to a Draft Exception, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for four Provisioning metrics.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL awaits a response from BLS to a Draft Exception, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Completion Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for one Provisioning metric.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing a response from BLS to a Draft Exception, regarding Metrics associated with the GPSC's June 6<sup>th</sup> Order.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that a number of BLS's graphical charts depicting the GPSC approved Performance Measurements reviewed by KCL contained errors or identified issues.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL expects to submit a Draft Exception, regarding xDSL, to BLS shortly.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not provide timely pre-order and order responses.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL expects to submit a Draft Exception, regarding xDSL, to BLS shortly.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not provide Acknowledgments within agreed upon standard intervals.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>

<sup>1</sup> Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item was first referenced in the November 19, 1999 report. An item referenced as IV-n indicates that the item was first referenced in the December 21, 1999 report. An item referenced as V-n indicates that the item was first referenced in the March 3, 2000 report. An item referenced as VI-n indicates that this item was first referenced in the April 6, 2000 report. An item referenced as VII-n indicates that this item was first referenced in the May 12, 2000 report. An item referenced as VIII-n indicates that this item was first referenced in the June 9, 2000 report. An item referenced as IX-n indicates that this item was first referenced in the July 21, 2000 report. There have been no new items on the past four reports (September 15, 2000, November 1, 2000, December 13, 2000 and January 26, 2001).

<sup>2</sup> According to the exception process agreed to by KCL, BellSouth and the Georgia Public Service Commission, when KCL discovers a potential component defect (e.g., a deficiency in a procedure, system or document) written substantiation is submitted to BellSouth detailing KCL's findings. BellSouth provides a written response to this finding. KCL's written substantiation is considered a "Draft Exception" until the potential defect has been confirmed. If KCL's assessment of the potential error is determined to be inaccurate, KCL will withdraw the Draft Exception. If the issue is substantiated, the Draft Exception and BellSouth response will be submitted to and published by the Commission, and the parties will agree on resolution steps. A complete exception listing, including all exceptions, responses, amended responses and closure reports, may be found on the Georgia Public Service Commission's Web site at [www.psc.state.ga.us](http://www.psc.state.ga.us).



CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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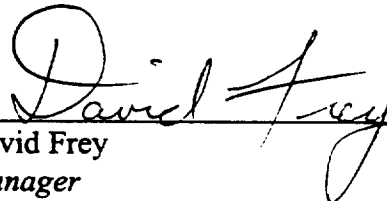
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This 26<sup>th</sup> day of January, 2001.

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\_\_\_\_\_  
David Frey  
Manager

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February 2, 2001

Ms. Helen O'Leary  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street  
Atlanta, GA 30334

RECEIVED  
FEB 02 2001  
EXECUTIVE SECRETARY  
GA.P.S.C.

**RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U**

Enclosed please find an original and twenty (20) copies, as well as an electronic copy, of KPMG Consulting LLC's document entitled *01/26/01 Interim Status Report - REVISIONS*.

We request that this document be filed in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey  
Manager

Enclosures

cc: Parties of Record



February 2, 2001

**RE: 01/26/01 Interim Status Report—REVISIONS**

On January 26, 2001, KPMG Consulting LLC (KCL) filed its Interim Status Report with the Georgia Public Service Commission. Subsequent to filing the document, KCL detected two items that require revision.

The first is on page 22 and pertains to the first row describing Exception 121. The bullet listed under the column heading "Issues" for Exception 121 is incorrect. It should have stated, **"BellSouth's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number (RPON) designed with non-designed services."** The bullets for the other headings for Exception 121 are accurate.

The second is on page 23 and pertains to the second row describing a Draft Exception in the xDSL test. The entire row of information related to this Draft Exception should have been omitted.

KCL has attached revised replacement pages 22 and 23 of the *1/26/01 Interim Status Report* to this letter. No other items in the January 26<sup>th</sup> document have been altered. If you have any questions, please do not hesitate to call Rob Elgie of KPMG Consulting LLC at 403-630-5589.

Very truly yours,

  
David Frey  
Manager

Enclosures

cc: Parties of Record

**BellSouth-GA OS Testing Evaluation  
Interim Status Report—REVISIONS  
February 2, 2001**

Ref <sup>1</sup>	Item	Status	Issues	Next Step Resolution
	<ul style="list-style-type: none"><li>• KCL is investigating issues related to Exception 121, regarding xDSL.</li></ul>		<ul style="list-style-type: none"><li>• BellSouth's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number (RPON) designed with non-designed services.</li></ul>	<ul style="list-style-type: none"><li>• KCL's further activities will be based upon its investigation of this exception.</li></ul>
	<ul style="list-style-type: none"><li>• KCL is reviewing BLS's response to Exception 122, regarding Metrics.</li></ul>		<ul style="list-style-type: none"><li>• KCL indicated that Definitions and Business Rules in the <i>Service Quality Measurements Georgia Performance Reports</i> (SQM Reports) are incomplete or inaccurate for the Firm Order Confirmation (FOC) Timeliness and Reject Interval Ordering Service Quality Measurements.</li></ul>	<ul style="list-style-type: none"><li>• KCL's further activities will be based on its review of BLS's response.</li></ul>
	<ul style="list-style-type: none"><li>• KCL is awaiting the release of an updated version of the <i>Raw Data Users Manual</i> in order to perform re-testing activities related to Exception 123, regarding Metrics.</li></ul>		<ul style="list-style-type: none"><li>• KCL indicated that BLS's raw data is insufficient for calculating the October 2000 <i>Percent Provisioning Troubles within 30 Days of Service Order Activity</i> Service Quality Measurement (SQM) for the KCL Test CLEC.</li></ul>	<ul style="list-style-type: none"><li>• KCL's further activities will be based upon its review of the updated <i>Raw Data Users Manual</i>.</li></ul>
	<ul style="list-style-type: none"><li>• KCL is performing re-testing related to Exception 124, regarding Billing.</li></ul>		<ul style="list-style-type: none"><li>• KCL indicated that BLS issued multiple bills that contained incorrectly rated and missing charges.</li></ul>	<ul style="list-style-type: none"><li>• KCL's further activities will be based on the outcome of re-testing activities.</li></ul>
	<ul style="list-style-type: none"><li>• KCL is reviewing a closure report for Exception 125, regarding Ordering and Provisioning, internally.</li></ul>		<ul style="list-style-type: none"><li>• KCL indicated that BLS's process for generating Completion Dates (CN DDs) for Local Service Requests (LSRs) may result in inaccuracies between the CN DD provided to the CLEC and the actual date of service completion.</li></ul>	<ul style="list-style-type: none"><li>• After internal review, KCL expects to submit this closure report to the GPSC.</li></ul>
	<ul style="list-style-type: none"><li>• KCL expects to issue Exception 126, regarding xDSL, shortly.</li></ul>		<ul style="list-style-type: none"><li>• KCL indicated that BLS's provisioning completion activities for xDSL orders are not consistent with the confirmation due date provided on the Firm Order Confirmation (FOC).</li></ul>	<ul style="list-style-type: none"><li>• KCL's further activities will be based upon its investigation of this exception.</li></ul>

**BellSouth-GA Operating Evaluation  
Interim Status Report—REVISIONS  
February 2, 2001**

Ref	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"> <li>KCL is reviewing BLS's amended response to a Draft Exception, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's amended response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing BLS's response to a Draft Exception, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for four Provisioning metrics.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL awaits a response from BLS to a Draft Exception, regarding Metrics.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS-reported raw data values for Completion Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for one Provisioning metric.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL is reviewing a response from BLS to a Draft Exception, regarding Metrics associated with the GPSC's June 6<sup>th</sup> Order.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that a number of BLS's graphical charts depicting the GPSC approved Performance Measurements reviewed by KCL contained errors or identified issues.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL expects to submit a Draft Exception, regarding xDSL, to BLS shortly.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not provide timely pre-order and order responses.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>
		<ul style="list-style-type: none"> <li>KCL expects to submit a Draft Exception, regarding xDSL, to BLS shortly.</li> </ul>	<ul style="list-style-type: none"> <li>KCL indicated that BLS does not provide Acknowledgments within agreed upon standard intervals.</li> </ul>	<ul style="list-style-type: none"> <li>Based on BLS's response, KCL will file or withdraw this draft exception.</li> </ul>

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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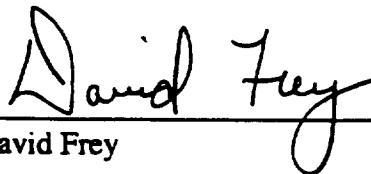
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This 2<sup>nd</sup> day of February, 2001.

  
David Frey

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FEB 02 2001

Year	1999	2000	2001	2002
1999	100	100	100	100
2000	100	100	100	100
2001	100	100	100	100
2002	100	100	100	100

**EXCEPTION 121**BellSouth Georgia OSS Testing Evaluation

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Date: January 8, 2001

**EXCEPTION REPORT**

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

**Exception:**

**BellSouth's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number (RPON) designed with non-designed services.**

**Summary of Exception:**

BellSouth's manual ordering documentation does not indicate that RPONing a designed order with a non-designed order is not possible.

KPMG Consulting LLC (KCL) attempted to submit orders that were designed (xDSL capable loop) with a related purchase order number that was non-designed (SL1 Loop). KCL received clarifications that "RPON cannot be used to relate to another LSR that does not require a Service Inquiry."

KCL requested further information regarding these clarifications via the Help Desk Log. BellSouth responded back: "Per LEO-IG, Vol 1, 4.3.1.40, RPON-Note 13: If LSR requires a Service Inquiry, RPON can not be used to relate another LSR that does not require a Service Inquiry; SL1-Non Designed Loop does not require a Service Inquiry; SL2-Designed Loop requires a Service Inquiry."

KCL is presently using CG-LEOO-009 Issue 9H and there is no reference stating the inability to submit such an order.

Examples of submitted orders and their RPONS are:

PON	RPON
X001B21001	X001BR21001
X001B21003	X001BR21003
X001B21004	X001BR21004
X001A21011	X001R21011

**Impact:**

The inability to RPON orders for the same end-user customer leads to increased cost for the CLEC. The CLEC will then be responsible to send two orders and then coordinate the provisioning dates for the service to be provided.

Date: December 18, 2000

## **EXCEPTION REPORT**

An exception has been identified as a result of the EDI and TAG Ordering Functional Evaluations (O&P-1 and O&P-2).

### **Exception:**

**BellSouth's process for generating Completion Dates (CN DDs) for Local Service Requests (LSRs) may result in inaccuracies between the CN DD provided to the CLEC and the actual date of service completion.**

BellSouth delivers CNs upon the conclusion of "field provisioning"<sup>1</sup> activities as well as all subsequent downstream (listing and billing) provisioning activities<sup>2</sup>. Within the CN, BellSouth provides the field provisioning completion date (located in the 'DD' field). Regardless of downstream errors encountered during the provisioning process and the time at which the CN response is actually transmitted, the CN DD field should accurately represent the actual date of service provisioning.

Based on discussions with BellSouth, KPMG Consulting LLC (KCL) believes BellSouth's process for generating CN DDs is inaccurate.

- For Local Number Portability (LNP) service requests, the CN DD field appears to be populated with the date on which the CN was sent. This is not always the date on which the service provisioning actually completed.
- For non-LNP service requests, BellSouth populates the CN DD with the completion date from the first internal service order. For some service requests, BellSouth generates multiple internal service orders. On occasion, these service orders may not complete on the same day. As a result, the CLEC could receive a CN DD that is earlier than the actual completion date.

### **Impact:**

The absence of accurate information for Completion Notifications prevents a CLEC from maintaining an accurate current status of its customers' requested services and may impede the timing of maintenance and billing activities.

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<sup>1</sup> The "field provisioning" date is defined as the date on which actual service completion occurred.

<sup>2</sup> For Local Number Portability (LNP) orders, BellSouth returns CNs following all provisioning activities and after the CLEC completes the porting of associated Telephone Numbers with the Number Portability Administration Center (NPAC).

# EXCEPTION 126

## BellSouth Georgia OSS Testing Evaluation

Date: December 18, 2000

### EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Test (PO&P-13).

#### Exception:

**BellSouth's provisioning completion activities for xDSL orders are not consistent with the confirmation due date provided on the Firm Order Confirmation (FOC).**

As part of testing, KPMG Consulting LLC (KCL) evaluated BellSouth's ability to complete the provisioning of orders on the confirmed due date.

Of the 87 orders KCL reviewed for provisioning timeliness, 10 orders (12%) were not completed on the confirmed due date provided by BellSouth on the FOC.

The following table provides details regarding this issue.

PON	Ver	FOC DD	GN DD	Res/Act	GCN/Resh
X001A110002	0	09/1/00	09/6/00	AV	9992
X001A11003	0	10/16/00	10/17/00	AV	9991
X001A11006	0	10/2/00	11/1/00	AV	9994
X001A12004	0	10/3/00	10/17/00	AV	9994
X039A11003	0	10/02/00	10/09/00	AN	9991
X039BR11001	0	09/21/00	9/25/00	AN	9994
X039B11003	0	10/02/00	10/03/00	AN	9991
X039B11008	0	10/04/00	10/05/00	AN	9994
X039B11009	0	10/02/00	10/20/00	AN	9994
X046A11005	0	09/29/00	10/02/00	AB	9994

**Impact:**

Lack of timely provisioning will affect CLECs in the following ways:

- **Decreased customer satisfaction.** If a CLEC's order is not provisioned in a timely fashion, the CLEC's customer will not receive the service as scheduled. This will result in a decrease in CLEC customer satisfaction, and possibly the loss of the customer's business.
- **Increase in operating costs.** If a CLEC is prepared to convert a customer's service and BellSouth does not complete provisioning activities as scheduled, CLECs must re-allocate resources to these activities. In effect, this means a CLEC will have to prepare for the conversion more than once. This will increase CLEC operating costs.



**EXCEPTION 127****BellSouth Georgia OSS Testing Evaluation**

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Date: November 16, 2000

**EXCEPTION REPORT**

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

**Exception:**

**BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals (HO)*, *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)<sup>2</sup> that KCL received from Hewlett Packard for June through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Commitment Date.

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<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

**EXCEPTION 127**  
BellSouth Georgia OSS Testing Evaluation**TABLE 1—COMMITMENT DATE**

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS- REPORTED VALUE	KCL- REPORTED VALUE	MONTH
R025H11PTN100010	TOX2M187	PMI	6/19/00	6/22/00	June
423A114PTM100006	NOFGGB38	JPDY	7/6/00	3/30/00	July
B100001PEJ101069	NP5M4544	JPDY	8/4/00	7/31/00	August
307R122PTH003001	COFJRG75	PMI	9/21/00	9/28/00	September
307R222PTH100002	CO05B5R9	PMI	9/21/00	9/26/00	September
454R126PEF001001	RPP18373	PMI	9/11/00	9/9/00	September

**Impact**

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

Date: January 5, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

### Exception:

**BellSouth-reported raw data values for Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for one Provisioning metric.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, *Average Completion Notice Interval (ACNI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMPLETION DATE<sup>2</sup> in the raw data files with the completion date that KCL received from Hewlett Packard for October and November 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain Purchase Order Numbers and Service Order Numbers. The following table lists the specific discrepancies for Completion Date.

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Completion Date is the actual date of completion of a service order.

**EXCEPTION 128**  
BellSouth Georgia OSS Testing Evaluation

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**COMPLETION DATE**

PURCHASE ORDER NUMBER	SO_NBR	RAW DATA FILE	BELLSOUTH- REPORTED VALUE	KCL- COLLECTED VALUE	MONTH
324R112PEH000003	CO33BBN0	JPDY	None	10/13/00	October
452R216PTF000002	RP7BNJW8	JPDY	None	10/02/00	October

**Impact**

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 71



January 26, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Pre-order Functional Test (PRE-1), the EDI and TAG UNE and Resale Functional Tests (O&P-1, O&P-2, and O&P-11) and the EDI and TAG UNE and Resale Documentation Evaluations (O&P-8, O&P-9, and O&P-14).

### Exception:

**The service establishment intervals returned on Calculate Due Date (CDD) pre-order responses are not consistent with intervals defined in the BellSouth *Product and Services Interval Guide*.**

When issuing a Local Service Request (LSR), CLECs are required to populate a Desired Due Date (DDD) for service completion. The interval between the DDD and the LSR submission date should be no shorter than the "standard" interval defined by BellSouth for the particular service type.<sup>1</sup>

BellSouth offers two methods for determining a service request type standard interval:

#### 1. *Documentation*

The BellSouth *Product and Services Interval Guide* provides targeted business-day service intervals based on product type, quantity of lines, and order activity type.

#### 2. *Pre-Order Inquiry*

The CDD pre-order provides CLECs with a tool for mechanized interval calculation via the Telecommunications Access Gateway (TAG). Based on inputs (requisition type, activity type, quantity of lines, product type of the planned LSR, and the pre-order transaction date), TAG returns a calculated due date.

BellSouth does not provide a CLEC with an authoritative source of interval guidelines. The two methods available yield inconsistent results. The following table details a sample of discrepancies between CDD pre-order responses and standard intervals defined in the *BellSouth Product and Services Interval Guide*. In some cases, the interval returned in response to CDD queries was shorter than the interval specified in the documentation. In other cases, it was longer.

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<sup>1</sup> A CLEC desiring a DDD earlier than the standard interval allows can request an "Expedited LSR." BellSouth fulfills expedited requests based on resource and staffing availability.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 71

REQ TYPE	ACT TYPE	UNE Product Type	ORDER TYPE	Num Lines	CDD Interval			Documentation Interval
					Submit Dt	Due Date	Days	
E	A	NOT UNE To Calculate	POTS	3	4/5/00	4/10/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/6/00	4/11/00	3	7
E	A	NOT UNE To Calculate	POTS	3	4/7/00	4/12/00	3	7
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	A	NOT UNE To Calculate	POTS	2	4/7/00	4/11/00	2	4
E	A	NOT UNE To Calculate	POTS	1	4/7/00	4/10/00	1	4
E	T	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	W	NOT UNE To Calculate	ISDN	1	4/10/00	4/11/00	1	16
E	V	NOT UNE To Calculate	ISDN	1	4/7/00	4/7/00	0	3
E	W	NOT UNE To Calculate	ISDN	1	4/7/00	4/10/00	1	16
E	A	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	ISDN	1	4/7/00	4/8/00	1	16
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/11/00	1	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
E	C	NOT UNE To Calculate	POTS	2	4/10/00	4/12/00	2	4
B	V	LocalNumberPortability_NotComplexServices	POTS	2	2/18/00	2/28/00	6	5
C	D	LocalNumberPortability_NotComplexServices	POTS	1	2/18/00	2/29/00	7	5
C	V	LocalNumberPortability_NotComplexServices	POTS	5	2/22/00	3/15/00	16	5
C	V	LocalNumberPortability_NotComplexServices	POTS	1	2/22/00	3/15/00	16	5
F	A	UnbundledLocalSwitching_2WireAnalogPort	POTS	8	2/22/00	3/15/00	16	3
F	C	UnbundledLocalSwitching_2WireAnalogPort	POTS	5	2/18/00	2/28/00	6	3
F	SS	UnbundledLocalSwitching_2WireAnalogPort	POTS	3	2/18/00	2/28/00	6	3
F	D	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/22/00	2/28/00	4	3
F	V	UnbundledLocalSwitching_2WireAnalogPort	POTS	1	2/18/00	2/28/00	6	3
A	A	UnbundledLoops	POTS	1	2/28/00	3/8/00	7	7

**Notes**  
 (1) UNE Product TYPE is a data element on the CDD inquiry. The valid entries are provided by BellSouth.  
 NOT UNE To Calculate is used for Resale service requests.  
 (2) CDD Interval obtained by subtracting the CDD query submission date from the due date returned by the CDD.  
 (3) Business Days

## Impact

Discrepancies between service establishment intervals returned on pre-orders and intervals contained in the BellSouth *Product and Services Interval Guide* will impact CLECs in the following ways:

- A CLEC obtaining interval information from the 'incorrect' source may be requesting service provisioning at a longer interval than is necessary, ultimately depriving its end-user from the most timely service available. Using the incorrect source, a CLEC may also request a shorter interval than BellSouth allows, resulting in service request errors and provisioning delays.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 71

## Amended Exception

KCL initiated an ordering functional re-test on August 25, 2000. During the re-test, KCL reviewed the service provisioning intervals returned in response to Calculate Due Date (CDD) requests against the intervals contained in BellSouth documentation.

KCL continued to observe discrepancies between the documented service intervals and those returned in response to CDD pre-orders. The majority of discrepancies occurred for UNE Loop-Port Combination accounts.

The following table presents the discrepancies encountered during re-testing.

REQ TYPE	ACB TYPE	UNE Product Type	ORDER TYPE	No. Lines	CDD Interval			Documentation Interval
					Submit Dt	Due Date	Days	
AB	C	Unbundled Loops	POTS	1	09/21/00	10/2/00	7	6
B	V	Unbundled Loops	POTS	6	10/02/00	10/16/00	9	7
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/6/00	4	3
J	R	O/S and DA UNEs	POTS	2	10/02/00	10/10/00	6	3
J	R	O/S and DA UNEs	POTS	1	10/02/00	10/10/00	6	3
M	A	Not a UNE to Calculate	POTS	1	09/20/00	9/25/00	3	4
M	A	Not a UNE to Calculate	POTS	1	09/28/00	10/10/00	6	4
M	C	Not a UNE to Calculate	POTS	3	09/06/00	9/11/00	3	7
M	C	Not a UNE to Calculate	POTS	3	09/20/00	9/25/00	3	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	3	10/02/00	10/9/00	5	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/10/00	6	7
M	C	Not a UNE to Calculate	POTS	1	10/02/00	10/12/00	8	7
M	C	Not a UNE to Calculate	POTS	2	09/14/00	9/20/00	4	7
M	C	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	7
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/10/00	6	4
M	D	Not a UNE to Calculate	POTS	2	09/20/00	9/25/00	3	4
M	D	Not a UNE to Calculate	POTS	2	10/02/00	10/9/00	5	4
M	M	Not a UNE to Calculate	POTS	2	08/28/00	9/8/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/28/00	9/25/00	3	4
M	V	Not a UNE to Calculate	POTS	2	09/20/00	9/27/00	5	4

### Notes

(1) UNE Product TYPE is a data element on the CDD inquiry. The valid entries are provided by BellSouth.

NOT UNE To Calculate is used for Resale service requests.

(2) CDD Interval obtained by subtracting the CDD query submission date from the due date returned by the CDD.

(3) Business Days

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 71

## Second Amended Exception

KCL is amending this exception to include details of discrepancies identified during a re-test of intervals for Resale service requests (PO&P-11). The following table provides details on Resale-related interval discrepancies between CDD pre-order responses and documented intervals.

REQ TYPE	ACT TYPE	Resale Product Type <sup>(1)</sup>	Qty Lines	CDD Interval <sup>(2)</sup>			Documentation Interval
				Submit Dt	Due Date	Days <sup>(3)</sup>	Days <sup>(3)</sup>
EB	C	LINEFEATURES	1	10/09/00	10/13/2000	4	2
EB	C	RINGMASTER	3	10/09/00	10/12/2000	3	7

Notes

(1) Resale Product Type is a data element on the CDD inquiry. The valid entries are provided by BellSouth.

(2) CDD Interval obtained by subtracting the CDD query submission date from the due date returned by the CDD.

(3) Business Days

## BellSouth Response

On a REQTYPE E and ACTTYPE C, the documented due date is 4 days and 3 days for Linefeatures and Ringmaster, respectively, which mirrors the intervals in the table above.



## **BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 71**

As an additional comment in response to the initial amended exception, BellSouth's Product and Services Interval Guide will be updated on 12/15/00 to include the interval for REQTYP J.

### **BellSouth Amended Response**

The January 2001 Products & Services Interval Guide (issue 4A) was posted to the Interconnection web site in error. It will be applicable to TAG release 2.4, which is tentatively scheduled for release in June of 2001. The July 2000 Products & Services Interval Guide (issue 3B) is the correct version for use with TAG release 2.2.0.11, however it was removed from the Interconnection web in error at the posting of the current (issue 4A) document. A carrier notification letter will be released in January to rectify this problem. In the interim, CLECs will not have access to the appropriate Products & Services Interval Guide via the Interconnection web site if they are on TAG release 2.2.0.11.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 76



Date: January 26, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Evaluation Retest.

### Exception:

**KPMG Consulting LLC (KCL) encountered BellSouth Switch Translations and directory listings provisioning errors for UNE-P orders.**

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to switch translation data and the directory listing database.

Of the 89 switch translations for lines that were validated, 16 lines (18.0%) contained information inconsistent with the corresponding LSRs. Of the 16 lines, one (6.3%) was flow-through and 15 (93.7%) were non-flow through.

Of the 55 directory listing orders, 34 were provisioned incorrectly, resulting in a 61.8% failure rate. Of the 34 orders, five (14.7%) listings were not listed in the database while 29 (85.3%) orders were listed incorrectly.

The following tables provide the specific data.

SWITCH TRANSLATION VERIFICATION						
PON	TN	OCN	Switch Translations Discrepancy	VE R	F/T	BellSouth Response
409R223PEM101001	(912) 755-9434	9990	No ESX	AA	Y	Do not agree, feature verified working in switch.
415R213PTM001002	(706) 303-9662	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303-2317	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303-2318	9990	Not working	AA	N	Agree, service not restored from suspension.
415R213PTM001002	(706) 303-2319	9990	Not working	AA	N	Agree, service not restored from suspension.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 76

PON	TN	OCN	Switch Translations Discrepancy	VE R	F/T	BellSouth Response
605R214PTJ000001	(706) 722-9484	9994	Wrong PIC & LPIC	AA	N	Agree, PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00.
605R214PTJ000001	(706) 722-9194	9994	Wrong PIC,	AA	N	Agree, PIC and LPIC incorrect. Service Rep error. Rep covered 12/15/00.
625R214PTJ000002	(912) 746-4538	9990	Wrong PIC & LPIC,	AB	N	Agree, PIC and LPIC incorrect. Service Rep error, Rep covered 12/15/00.
625R214PTJ000002	(912) 746-5245	9990	Wrong PIC & LPIC,	AB	N	Agree, PIC and LPIC incorrect. Service Rep error, Rep covered 12/15/00.
625R214PTJ000002	(912) 746-6152	9990	Wrong PIC & LPIC,	AB	N	Agree, PIC and LPIC incorrect. Service Rep error, Rep covered 12/15/00.
625R214PTJ000003	(706) 774-1688	9990	Wrong PIC & LPIC	AB	N	Agree, Service Rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774-6550	9990	Wrong PIC	AB	N	Agree, Service Rep error. Rep covered 12/15/00.
625R214PTJ000003	(706) 774-9891	9990	Wrong PIC	AB	N	Agree, Service Rep error. Rep covered 12/15/00.
625R214PTJ000005	(912) 746-0461	9990	Should not have NSQ	AA	N	Agree – should not have NSQ and this line does not have NSQ. No switch translation error.
625R214PTJ000005	(912) 746-1330	9990	Should not have NSQ	AA	N	Agree – should not have NSQ and this line does not have NSQ. No switch translation error.
625R214PTJ000005	(912) 746-7343	9990	Should not have NSQ	AA	N	Agree – should not have NSQ and this line does not have NSQ. No switch translation error.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 76

DIRECTORY LISTINGS VERIFICATION							
PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	V E R	BellSouth Response
301R112PEF000009	N	9991	(706) 434-0845	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PEF100011	Y	9991	(706) 434-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PEF101020	Y	9991	(706) 434-0851	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PTF002001	N	9994	(706) 434-0806	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
305R112PTF100012	Y	9994	(912) 314-0807	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	1	Do not agree. Listed as requested.
305R112PTF100013	N	9994	(404) 214-0684	Number is listed as "non-published" and "listed number". Should only be LN.	UNE-Analog Loop	2	Do not agree. Listed as requested.
307R122PEF001009	N	9994	(404) 214-0685	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R122PEF001010	N	9994	(912) 314-0809	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R122PEF001011	N	9994	(912) 314-0808	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R122PTF000008	N	9991	(706) 434-0810	Should be listed as Rwh but listed as R W H.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R222PTF000005	N	9991	(706) 434-0811	Should be listed as Rwh but listed as RWH.	UNE-Analog Loop	0	Do not agree. Listed as requested.
307R222PTF000006	N	9991	(912) 314-0810	Should be listed as RWH but listed as R W H.	UNE-Analog Loop	1	Do not agree. Listed as requested.
319R122PEF101023	Y	9994	(706) 434-0849	Should be listed as Rwh but listed as RWH.	DL	2	Do not agree. Listed as requested.
319R122PTF000017	N	9994	(706) 434-0848	Should be listed as Rwh but listed as RWH.	DL	0	Do not agree. Listed as requested.
319R122PTF000018	N	9994	(478) 314-0821	Should be listed as Rwh but listed as RWH.	DL	1	Do not agree. Listed as requested.
328R312PTI000002	N	9991	(912) 742-0979	Should be listed as Rwh but listed as RWH.	LLNP	0	Do not agree. Listed as requested.

# BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 76

PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	V E R	BellSouth Response
330R222PEI000004	N	7727	(706) 722-8897	No listing found, but should be listed as LN.	LLNP	0	Do not agree. Listing not requested for this TN.
350R112PTI000002	N	7727	(706) 722-4544	Should be listed as RWH but listed as R W H.	LLNP	0	Do not agree. Listed as requested.
383R215PEG000004	N	7727	(706) 722-1321	No listing found, but should be listed as NP.	LNP	0	Do not agree. Listing not requested for this TN.
383R215PEG000006	N	7727	(912) 742-6976	No listing found, but should be listed as NP.	LNP	0	Do not agree. Listing not requested for this TN.
395R213PEM100002	Y	9994	(912) 746-6208	Should be listed as Rwh but listed as RWH.	Port Order	0	Do not agree. Listed as requested.
395R213PTM100001	Y	9994	(706) 828-6865	Should be listed as Rwh but listed as RWH.	Port Order	0	Do not agree. Listed as requested.
422R114PEJ100003	Y	9994	(404) 929-6480	Should be listed as Rwh but listed as RWH.	LPC	1	Do not agree. Listed as requested.
422R114PEJ101001	Y	9994	(706) 303-2412	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
423R114PEJ101002	Y	9994	(912) 742-7604	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
423R114PTJ100003	Y	9994	(404) 417-0398	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
423R114PTJ101001	Y	9994	(706) 722-4464	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
435R114PEJ001003	N	9990	(478) 742-3853	Should be listed as Rwh but listed as RWH.	LPC	0	Do not agree. Listed as requested.
452R216PTF000002	N	9990	(706) 774-9339	No listing found but should be listed as AL.	DL	0	Agree, service rep error. Rep covered 12/15/00.
605R214PEJ000002	N	9994	(912) 742-6359	No listing found but should be listed as LN.	LPC	0	Agree, service rep error. Rep covered 12/15/00.
605R214PTJ000003	N	9994	(404) 417-0464	Wrong TN information was brought up on the screen.	LPC	0	Agree, service rep error. Rep covered 12/15/00.

## BELLSOUTH'S THIRD AMENDED RESPONSE TO EXCEPTION 76

PON	FT	OCN	TN	Directory Listing Discrepancy	Order Type	V E R	BellSouth Response
606R123PEM000003	N	9990	(404) 321-4748	Should be listed as Rwh but listed as R W H.	Port Order	0	Do not agree. Listed as requested.
606R123PTM000004	N	9990	(912) 742-9886	Should be listed as Rwh but listed as R W H.	Port Order	0	Do not agree. Listed as requested.
606R123PTM001002	N	9990	(706) 724-0819	Should be listed as Rwh Enterprises but listed as Georgia R W H.	LPC	0	Agree, service rep error. Rep covered 12/15/00.

### Impact:

Inaccurate provisioning will affect CLECs in the following way:

- Switch Translations—customers not receiving features that were ordered
- Directory Listing - directory listings that are not listed or incorrectly listed will result in the CLEC customers either being omitted from the BellSouth-GA directories and/or Directory Assistance databases, or having their listings incorrectly listed.

Inaccurate provisioning will negatively affect CLEC-customer relationships through unmet expectations. A CLEC customer will receive the incorrect level or type of service, resulting in decreased customer satisfaction.

### BellSouth Response

Bellsouth's responses to the individual occurrences have been incorporated into the above table.

BellSouth agrees with 15 of the 16 instances for switch translations (16.9%) and 4 of the 34 instances.

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77



January 25, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

### Exception:

**BellSouth does not deliver timely fully mechanized Clarification (CLR) responses.**

**Background:** In response to a valid Local Service Request<sup>1</sup> (LSR) that contains an error, BellSouth returns a CLR to the CLEC. A CLR is generated in one of two ways:

#### 1. Fully Mechanized

A fully mechanized CLR, or auto clarification, is a system-generated error message.

#### 2. Partially Mechanized

A partially mechanized CLR is generated by a BellSouth ordering representative after an electronically submitted service request falls out for manual handling in the Local Carrier Service Center (LCSC).

BellSouth commits to returning 95% of CLRs for fully mechanized service requests within one hour and to returning 85% of CLRs for partially mechanized service requests within 48 hours.<sup>2</sup>

**BellSouth Performance<sup>3</sup>:** In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely fully mechanized CLR responses.

- 92% of fully mechanized CLRs were returned via the TAG interface within the specified timeframe<sup>4</sup>.
- 17% of fully mechanized CLRs were returned via the EDI interface within the specified timeframe<sup>5</sup>.

<sup>1</sup> According to the *BellSouth-Georgia Service Quality Measurements (SQMs), Draft Version 1.4, p.14*, a service request is not considered valid until it passes system edits to ensure all required fields are populated. An "Invalid" LSR will be returned to a CLEC as a Fatal Reject.

<sup>2</sup> These timeliness standards, proposed by BellSouth, have not yet been approved by the Georgia Public Services Commission.

<sup>3</sup> This exception includes data for LSRs submitted through April 21, 2000. All Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized CLR responses for LNP orders was not provided to KPMG.

<sup>4</sup> Response timeliness did not significantly improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For fully mechanized CLRs received between 2/8/00 and 4/21/00, 93% were returned within one hour via TAG.

## BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

The following tables provide a detailed breakdown of response time for fully mechanized and partially mechanized CLR<sup>6</sup>s.

### Fully Mechanized CLR Timeliness Summary

CLRs Received via TAG						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
95	2	0	3	1	2	0
92.2%	1.9%	0%	2.9%	1.0%	1.9%	0.0%
CLRs Received via EDI						
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs	>48 hrs
15	59	5	5	2	0	1
17.2%	67.8%	5.7%	5.7%	2.3%	0.0%	1.1%

### Fully Mechanized CLR Detail – Untimely TAG CLR

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	24-48 hrs
382A225PTH101002	00	9992	X				
382A225PTH100002	00	9992	X				
305A122PTH101002	00	9994			X		
305A122PTH101001	05	9994			X		
305A112PTH100001	17	9994			X		
307X222PTH101001	05	9994				X	
305A122PTH100002	03	9994					X
395A213PTH100002	00	9994					X

<sup>5</sup> Response timeliness did not improve after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For fully mechanized CLR<sup>6</sup>s received between 2/8/00 and 4/21/00, 15% were received within one hour.

<sup>6</sup> KPMG used Actual Flow Through data (provided from BellSouth as part of the Flow Through Evaluation) to determine whether CLR<sup>6</sup>s were fully or partially mechanized.



# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

## Fully Mechanized CLR Detail – Untimely EDI CLRs

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	> 24 hrs
303A222PEH101001	0	9994	X				
378A315PEI001001	0	9992	X				
626A224PEJ100003	0	9991	X				
305A222PEH100001	2	9994	X				
607A214PEJ103002	0	9991	X				
607A214PEJ101001	0	9991	X				
301A212PEH100001	0	9994	X				
315A212PEH100024	0	9994	X				
420A124PEJ100008	0	9994	X				
307A122PEH100005	0	9994	X				
307A122PEH100003	1	9994	X				
324A112PEH100002	2	9991	X				
324A112PEH101005	0	9991	X				
433A127PEH000004	0	9994	X				
309A122PEH100007	0	9994	X				
308F312PEH102001	0	9994	X				
303A222PEH101001	1	9994	X				
324A112PEH100002	0	9991	X				
305A222PEH100001	1	9994	X				
308F312PEH100001	0	9994	X				
607C214PEJ100001	0	9991	X				
305A222PEH101001	0	9994	X				
315X212PEH100001	0	9991	X				
305A122PEH100010	1	9994	X				
309A122PEH101001	0	9994	X				
324A112PEH100003	0	9991	X				
324A112PEH100002	1	9991	X				
626A224PEJ100012	0	9991	X				
309A122PEH101001	6	9994	X				
305A212PEH100004	0	9994	X				
323A122PEH100006	1	9991	X				
323A122PEH100006	2	9991	X				
600A212PEH000002	0	9994	X				
326A212PEI100003	0	9992	X				
323A122PEH100006	0	9991	X				
324A112PEH100003	1	9991	X				
305A222PEH100009	0	9994	X				
607A214PEJ100001	0	9994	X				
620A212PEH101004	0	9991	X				

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

PON	VER	CC	1-2 hrs	2-4 hrs	4-12 hrs	12-24 hrs	> 24 hrs
305A222PEH100001	0	9994	X				
420A124PEJ100001	0	9994	X				
606A123PEM101006	0	9991	X				
604D224PEJ000001	0	9994	X				
600A212PEH001001	0	9994	X				
615A122PEF100013	0	9991	X				
625A214PEJ100005	2	9991	X				
422A114PEJ101001	2	9994	X				
625A214PEJ100005	0	9991	X				
378A315PEI001001	3	9992	X				
308F312PEH100001	1	9994	X				
308F312PEH101001	0	9994	X				
409X223PEM101001	0	9991	X				
608A124PEJ100004	1	9991	X				
303A222PEH100003	0	9994	X				
305A122PEH100010	0	9994	X				
608A124PEJ100004	0	9991	X				
626A224PEJ100011	0	9991	X				
422A114PEJ100001	0	9994	X				
601A212PEF101007	0	9994	X				
625A214PEJ100004	0	9991		X			
615A122PEH100010	0	9991		X			
382D225PEG100005	0	9991		X			
307A122PEH100003	0	9994		X			
607A214PEJ103002	4	9991		X			
311A212PEH101001	0	9994			X		
301A112PEF100007	4	9994			X		
315A212PEH100024	1	9994			X		
305A212PEH101004	0	9994			X		
606A123PEM100006	2	9991			X		
307A122PEH101003	0	9994				X	
305A122PEH101010	0	9994				X	
428X224PEJ100001	0	9994					X

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

## Amended Exception

KCL initiated a UNE functional re-test on August 25, 2000. Based on results through November 8, KCL has received Fully-mechanized error (FM ERR/CLR) responses from BellSouth outside of the standard response time<sup>7</sup>. Of the 22 FM errors delivered via TAG, 68% were received on time (within 1 hour). Of the 108 FM errors delivered via EDI, 64% were received on time.

TAG FM Response Timeliness					
<1 hr	1-2 hrs	2-4 hrs	12-24 hrs	48-72 hrs	TOTAL
15	2	1	2	2	22
68%	9%	5%	9%	9%	100%

EDI FM Response Timeliness					
<1 hr	1-2 hrs	2-4 hrs	12-24 hrs	48-72 hrs	TOTAL
69	37	2	--	--	108
64%	34%	2%	--	--	100%

The following tables provide detail associated with those PONs receiving late FM error responses.

TAG					
PON*VER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response
305R112PTF101002*00	9991	9/15/2000 11:29:26 AM	9/15/2000 12:36:00 PM	1-2 hrs	Rec 9/15 10:37 Clar 9/15 11:01
305R112PTF101002*00	9991	9/15/2000 3:02:06 PM	9/15/2000 4:13:28 PM	1-2 hrs	Rec 09/15 2:18 Rej 09/15 2:45
350R112PTI000002*00	7727	10/12/2000 4:51:33 PM	10/12/2000 8:14:38 PM	2-4 hrs	Rec 10/12 4:52 Rej 10/12 4:52 Apparent KPMG TAG listener problem
333R122PTI000001*00	7727	8/30/2000 8:46:45 AM	8/31/2000 5:21:14 AM	12-24 hrs	Rec 8/30 8:47 Rej 8/30 8:47 Apparent KPMG TAG listener problem
354R212PTI000002*00	7727	10/2/2000 6:20:16 PM	10/3/2000 6:35:55 AM	12-24 hrs	Rec 10/02 6:21 Rej 10/02 6:21 Apparent KPMG TAG listener problem
440R124PTJ000001*00	9990	8/28/2000 12:06:46 PM	8/30/2000 5:08:29 PM	48-72 hrs	Rec 8/28 11:07 Rej 8/28 11:07 Apparent KPMG TAG listener problem

<sup>7</sup> The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FM errors within 1 hour.

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

TAG					
PON*VER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response
801R222PTI000001*00	7727	8/28/2000 6:50:40 PM	8/31/2000 5:49:15 AM	48-72 hrs	Rec 08/28 6:51 Rej 08/28 6:51 Apparent KPMG TAG listener problem

EDI						
PON*VER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response	EDI Translator Time (CST)
305R112PEF101020*00	9991	10/16/2000 3:22:00 PM	10/16/2000 4:27:37 PM	1-2 hrs	Rec 10/16 2:36 Clar 10/16 3:01	200009281250 9/28/2000 12:50p.m.
305R112PEF100020*00	9991	10/6/2000 11:08:24 AM	10/6/2000 12:14:43 PM	1-2 hrs		200010061114 10/06/2000 11:14a.m.
305R112PEF100020*00	9991	10/4/2000 2:20:10 PM	10/4/2000 3:28:28 PM	1-2 hrs		200010041428 10/04/2000 2:28p.m.
320R212PEF100005*00	9991	10/3/2000 5:14:28 PM	10/3/2000 6:14:30 PM	1-2 hrs		200010031714 10/03/2000 5:14p.m.
320R212PEF100005*00	9991	10/2/2000 2:37:27 PM	10/2/2000 3:55:41 PM	1-2 hrs	Rec 10/2 1:48 Clar 10/2 2:32	200010021452 10/02/2000 2:52p.m.
309R122PEH000002*00	9994	9/28/2000 9:16:33 AM	9/28/2000 10:16:29 AM	1-2 hrs		200009280915 09/28/2000 9:15a.m.
307R222PEH000001*00	9994	9/22/2000 10:32:51 AM	9/22/2000 11:38:42 AM	1-2 hrs		200009221038 09/22/2000 10:38a.m.
323R122PEH001001*00	9991	9/19/2000 2:58:52 PM	9/19/2000 4:09:00 PM	1-2 hrs		
323R122PEH001001*00	9991	9/15/2000 10:43:36 AM	9/15/2000 11:53:28 AM	1-2 hrs		
315R212PEH000002*00	9991	9/15/2000 10:12:45 AM	9/15/2000 11:53:28	1-2 hrs		
323R122PEH000001*00	9991	9/14/2000 1:10:59 PM	9/14/2000 2:13:37 PM	1-2 hrs		
305R112PEH000002*00	9991	9/6/2000 3:46:36 PM	9/6/2000 4:51:12 PM	1-2 hrs	Rec 9/6 3:01 Clar 9/6 3:30	
305R112PEH000002*00	9991	9/6/2000 11:20:53 AM	9/6/2000 12:27:29 PM	1-2 hrs	Rec 9/6 10:41 Clar 9/6 11:02	

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

EDL						
PON V ER	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response	EDI Translator Time (CST)
319R122PEH000001*00	9990	10/5/2000 1:47:54 PM	10/5/2000 2:51:32 PM	1-2 hrs		
318R112PEH000004*00	9994	9/28/2000 1:20:45 PM	9/28/2000 2:31:18 PM	1-2 hrs		
432R214PEJ000001*00	9990	8/30/2000 12:13:30 PM	8/30/2000 1:24:27 PM	1-2 hrs		
454R126PEF001001*00	9990	9/5/2000 1:18:09 PM	9/5/2000 2:18:43 PM	1-2 hrs		
452R216PEF000001*00	9990	8/25/2000 12:20:33 PM	8/25/2000 1:27:51 PM	1-2 hrs		
435R114PEJ000003*00	9990	10/4/2000 9:11:33 AM	10/4/2000 10:15:38 AM	1-2 hrs		

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

PON*VLR	CC	Date Sent	Response Rcvd	Response Category	BellSouth Response	EDI Translator Time
307R122PEF000003*00	9991	9/19/2000 10:50:23 AM	9/19/2000 11:50:18 AM	1-2 hrs		
307R122PEF000003*00	9991	9/14/2000 10:27:27 AM	9/14/2000 11:41:47 AM	1-2 hrs		
303R222PEH000002*00	9994	9/25/2000 3:00:14 PM	9/25/2000 4:04:43 PM	1-2 hrs		
307R122PEF000009*00	9994	10/5/2000 11:33:52 AM	10/5/2000 12:37:54 PM	1-2 hrs		
307R122PEH000005*00	9994	9/28/2000 12:48:59 PM	9/28/2000 1:50:25 PM	1-2 hrs		200009281250 09/28/2000 12:50p.m.
307R122PEH000003*00	9991	9/20/2000 2:16:21 PM	9/20/2000 3:29:52 PM	1-2 hrs		200009201428 09/20/2000 2:28p.m.
305R222PEH000001*00	9994	8/25/2000 11:45:14 AM	8/25/2000 12:50:04 PM	1-2 hrs		200008251150 08/25/2000 11:50a.m.
318R112PEH000001*02	9994	9/19/2000 3:04:39 PM	9/19/2000 4:09:00 PM	1-2 hrs		200009191506 09/19/2000 3:06p.m.
319R122PEF000016*00	9990	10/18/2000 10:46:26 AM	10/18/2000 11:50:39 AM	1-2 hrs		200010181050 10/18/2000 10:50a.m.
329R212PEI000001*01	7727	8/28/2000 12:02:15 PM	8/28/2000 2:34:06 PM	2-4 hrs	Rec 8/28 2:08 Rej 8/28 2:08	200008281321 08/28/2000 1:21p.m.
329R212PEI001001*00	7727	8/28/2000 3:51:20 PM	8/28/2000 5:54:47 PM	2-4 hrs	Rec 8/28 5:15 Rej 8/28 5:15	200008281652 08/28/2000 4:52p.m.
329R212PEI002001*00	7727	9/15/2000 10:12:45 AM	9/15/2000 11:12:57 AM	1-2 hrs		
330R222PEI000002*00	7050	9/14/2000 9:54:30 AM	9/14/2000 10:55:19 AM	1-2 hrs		200009140950 09/14/2000 9:50a.m.
330R222PEI000003*00	7050	10/16/2000 8:59:09 PM	10/16/2000 10:03:05 PM	1-2 hrs		
349R212PEI000003*00	7050	9/26/2000 10:28:58 AM	9/26/2000 11:35:04 AM	1-2 hrs		
409R223PEM100001*00	9994	9/14/2000 11:22:13 AM	9/14/2000 12:30:36 PM	1-2 hrs	Rec 9/14 10:43 Rej 9/14 11:00	
428R124PEJ100001*00	9994	8/28/2000 3:52:37 PM	8/28/2000 5:11:05 PM	1-2 hrs		
452R216PEF000001*02	9990	9/5/2000 1:14:28 PM	9/5/2000 2:18:43 PM	1-2 hrs		
454R126PEF000001*00	9990	8/29/2000 11:14:36 AM	8/29/2000 12:18:08 PM	1-2 hrs		
606R123PEM000003*00	9990	9/20/2000 9:25:32 AM	9/20/2000 10:28:55 AM	1-2 hrs		

## BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

KCL has also amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of EDI Fully-Mechanized errors on Resale service requests as those uncovered during the UNE evaluations (O&P-1 and O&P-2).

Of the service requests submitted via the EDI interface, 9% of FM errors were received within 1 hour<sup>8</sup>.

EDI FM Response Timeliness				
<1 hr	1-2 hrs	2-4 hrs	4-12 hrs	TOTAL
4	27	10	3	44
9%	61%	23%	7%	100%

The following table provides detail on the late Resale FM errors received.

PO#	VER	CC	TSR SENT	CLR RECEIVED	<2 hrs	2-4 hrs	4-12 hrs	BellSouth Response
R019A11PEN100001	00	9991	03/10/00 02:08 PM	03/10/00 03:30 PM	X			Rec 3/10 1:18 Clar 3/10 1:41
R025A11PEN100001	00	9992	03/10/00 02:22 PM	03/10/00 03:43 PM	X			
R027H12PEN100001	00	9991	04/28/00 01:20 PM	04/28/00 02:46 PM	X			
R018B21PEN000003	00	9990	03/15/00 10:41 AM	03/15/00 12:01 PM	X			
R018B21PEN000001	00	9990	03/15/00 10:38 AM	03/15/00 12:01 PM	X			
R019A11PEN100003	00	9991	03/10/00 02:10 PM	03/10/00 03:30 PM	X			Rec 3/10 1:18 Clar 3/10 1:36
R028A11PEN100013	00	9991	03/10/00 03:03 PM	03/10/00 04:43 PM	X			Rec 3/10 2:20 Clar 3/10 3:06
R028A11PEN100015	00	9991	03/10/00 03:05 PM	03/10/00 04:43 PM	X			Rec 3/10 816 Clar 3/10 9:00
R028A11PEN100016	00	9991	03/10/00 03:05 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R028A11PEN100017	00	9991	03/10/00 03:06 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R028A11PEN100018	00	9991	03/10/00 03:07 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R042A12PEN000008	00	9990	04/18/00 10:24 AM	04/18/00 11:43 AM	X			Rec 4/18 9:35 Clar 4/18 10:01
R028A11PEN100014	00	9991	03/10/00 03:04 PM	03/10/00 04:43 PM	X			Rec 3/10 2:30 Clar 3/10 3:06
R011H21PEN100006	02	9991	05/09/00 05:27 PM	05/09/00 06:30 PM	X			Rec 5/9 4:23 Clar 5/9 5:02
R002A21PEN100002	00	9992	03/15/00 10:07 AM	03/15/00 12:01 PM	X			Rec 3/15 9:39 Clar 3/15 10:06
R011H21PEN100006	00	9991	05/02/00 03:36 PM	05/02/00 04:41 PM	X			

<sup>8</sup> The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FM errors within 1 hour.

# BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

PON	VER	CC	LSR SENT	CLR RECEIVED	1-2 hrs	2-4 hrs	4-12 hrs	BellSouth Response
R005A22PEN100002	00	9993	03/17/00 02:26 PM	03/17/00 03:38 PM	X			Rec 3/17 1:47 Clar 3/17 2:00
R005A22PEN100002	01	9993	03/24/00 01:51 PM	03/24/00 03:25 PM	X			
R005G22PEN100002	00	9990	02/22/00 01:31 PM	02/22/00 02:59 PM	X			
R005G22PEN101002	00	9990	03/01/00 09:25 AM	03/01/00 10:36 AM	X			
R010A11PEN100002	00	9992	03/15/00 10:22 AM	03/15/00 12:01 PM	X			
R011C22PEN100003	00	9992	03/15/00 08:33 AM	03/15/00 09:43 AM	X			
R005G22PEN101002	02	9990	03/02/00 10:11 AM	03/02/00 11:11 AM	X			
R011C22PEN100005	00	9992	03/15/00 08:34 AM	03/15/00 09:43 AM	X			
R011C22PEN100006	00	9992	03/15/00 08:35 AM	03/15/00 09:43 AM	X			
R011C22PEN100007	00	9992	03/15/00 08:36 AM	03/15/00 09:43 AM	X			
R011C22PEN100003	01	9992	03/15/00 01:48 PM	03/15/00 03:42 PM	X			
R010A11PEN100002	01	9992	03/15/00 02:51 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:06
R002A21PEN100002	01	9992	03/15/00 03:56 PM	03/15/00 07:40 PM		X		Rec 3/15 3:30 Clar 3/15 4:06
R042A12PEN000004	00	9990	04/04/00 01:20 PM	04/04/00 04:41 PM		X		Rec 4/04 1:31 Clar 4/04 2:09
R028D11PEN000003	00	9990	03/15/00 02:35 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:07
R013A22PEN100001	00	9991	02/24/00 04:06 PM	02/24/00 06:33 PM		X		Rec 2/24 3:20 Clar 2/24 4:42
R028D11PEN000001	00	9990	03/15/00 02:33 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:06
R011C22PEN100006	01	9992	03/15/00 05:11 PM	03/15/00 07:40 PM		X		Rec 3/15 4:13 Clar 3/15 4:35
R047A11PEN000004	00	9992	03/30/00 11:09 AM	03/30/00 02:53 PM		X		Unable to Locate
R028D11PEN000002	00	9990	03/15/00 02:34 PM	03/15/00 05:08 PM		X		Rec 3/15 2:44 Clar 3/15 3:06
R047A11PEN000016	00	9990	03/30/00 11:08 AM	03/30/00 02:53 PM		X		Rec 3/30 10:53 Clar 3/30 12:04
R005G22PEN100002	01	9990	02/23/00 01:02 PM	02/23/00 08:38 PM			X	Rec 2/23 12:19 Clar 2/23 2:06
R028A11PEN100011	00	9991	02/18/00 01:31 PM	02/18/00 09:56 PM			X	Rec 2/18 5:18 Clar 2/18 8:12
R005F12PEN100001	00	9992	02/18/00 04:00 PM	02/18/00 09:56 PM			X	Rec 2/18 5:18 Clar 2/18 8:12



## BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 77

### Impact

The absence of timely CLRs will impact CLECs in the following way:

- **Decrease in Customer Satisfaction.** The receipt of a timely CLR is a critical factor in a CLEC's ability to process an end-user's service request. Delays in the return of a CLR will slow the CLEC's ordering process and delay delivery of the ordered service to the end-user. If a CLEC is unable to deliver ordered service to an end-user in a timely fashion, the CLEC's customer satisfaction will decrease.

### BellSouth Response

BellSouth's responses, as measured by LEO timestamps, to the individual occurrences have been incorporated into the above tables.

### TAG UNE

BellSouth disagrees with KPMG's results for TAG fully mechanized response timeliness. The individual responses can be seen in the table. Using the timestamps obtained by BellSouth from LEO, the TAG FM response timeliness is 100% < 1 hr.

### EDI UNE

BellSouth completed a random sample review of the EDI UNE PONs in the EDI table. BellSouth disagrees with 5 of the 5 PONs sampled in the 1-2 hr category and 2 of the 2 PONs sampled in the 2-4 hr category. Extrapolating these results, EDI FM response timeliness for UNE PONs is 100% < 1 hr.

### EDI Resale

BellSouth randomly reviewed 12 of the 27 EDI PONs in the 1-2 hr category and disagree with KPMG's findings on all 12 PONs. BellSouth also disagrees with 7 of the 10 incidents in the 2-4 hr category. The response timeliness based on this research leads to a result of 86% of the FM CLR responses < 1 hr. BellSouth began migration to a Mercator EDI solution on 1/15/01 to improve EDI timeliness results.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78



January 29, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

### Initial Exception:

**BellSouth does not deliver timely Firm Order Confirmation (FOC) responses to flow through local service requests (LSRs).**

### **Background:**

In response to a valid Local Service Request<sup>1</sup> (LSR), BellSouth returns a FOC. This FOC provides notification to the CLEC that its order is confirmed and provides a committed due date for completion of service provisioning. FOCs are generated for two types of service requests:

#### **1. Flow Through**

A flow through service request proceeds through back-end order validation systems to generate a FOC without any manual intervention.

#### **2. Non Flow Through**

A non-flow through service requests is submitted electronically and drops out for manual handling by a BellSouth ordering representative at some point during the order validation process prior to FOC generation.

BellSouth commits to returning 95% of FOCs for flow through service requests within four hours and to returning 85% of FOCs for non-flow through service requests within 48 hours.<sup>2</sup>

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<sup>1</sup> According to the *BellSouth-Georgia Service Quality Measurements (SQMs), Draft Version 1.4, p.14*, a service request is not considered valid until it passes system edits to ensure all required fields are populated. An "Invalid" LSR will be returned to a CLEC as a Fatal Reject.

<sup>2</sup> These timeliness standards, proposed by BellSouth, have not yet been approved by the Georgia Public Services Commission.

## BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78

**BellSouth Performance<sup>3</sup>:** In response to LSRs submitted via TAG and EDI, BellSouth failed to deliver timely flow through FOCs.

- 83% of flow through FOCs were returned via the TAG interface within the specified timeframe<sup>4</sup>.
- 87% of flow through FOCs were returned via the EDI interface within the specified timeframe<sup>5</sup>.

The following tables provide a detailed breakdown of response time for flow through FOCs<sup>6</sup>.

### Flow Through FOC Timeliness Summary

FOCs Received via TAG				
<4 hrs	4-24 hrs	24-36	36-48 hrs	48-72 hrs
38	1	1	3	3
82.6%	2.2%	2.2%	6.5%	6.5%
FOCs Received via EDI				
<4 hrs	4-24 hrs	24-36	36-48 hrs	48-72 hrs
47	3	2	0	3
87.0%	5.6%	3.7%	0.0%	3.7%

### Flow Through FOC Detail – Untimely TAG FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
602A214PTJ100002	00	9991	X			
409A223PTM100001	05	9991		X		
603A224PTJ100004	00	9991			X	
409A223PTM100002	00	9991			X	
382A225PTH102002	00	9991			X	
403A223PTM000001	01	9994				X
309A222PTH100001	04	9994				X
407A213PTM100003	03	9991				X

<sup>3</sup> This exception includes data for LSRs submitted through April 21, 2000. All Local Number Portability (LNP) service requests are *excluded* from this data set. Information on fully versus partially mechanized FOCs for LNP orders was not provided to KPMG.

<sup>4</sup> Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness of response issues. For flow through FOCs received between 2/8/00 and 4/21/00, 91% were returned within four hours via TAG.

<sup>5</sup> Response timeliness improved after 2/7/00, the date on which BellSouth completed a systems and process fix to address timeliness issues. For flow through FOCs received between 2/8/00 and 4/21/00, 95% were received within four hours via EDI.

<sup>6</sup> KPMG used Actual Flow Through data (provided by BellSouth as part of the Flow Through Evaluation) to determine whether FOCs were flow through or non-flow through.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78

## Flow Through FOC Detail – Untimely EDI FOCs

PON	VER	CC	4-24 hrs	24-36 hrs	36-48 hrs	48-72 hrs
301A112PEH100008	03	9994	X			
428A124PEJ100010	00	9994	X			
453C126PEF100001	00	9991	X			
606A123PEM100002	00	9991		X		
409A223PEM100003	00	9991		X		
326C222PEI100002	00	9992				X
409X223PEM100004	00	9991				X

### Amendment

KCL amended this exception to include the results of the Resale Functional Evaluation (PO&P-11). KCL experienced similar response timeliness problems with the delivery of Flow-Through Firm Order Confirmations (FT FOCs) on Resale service requests as those uncovered during the initial UNE evaluations (O&P-1 and O&P-2).

Of the service requests submitted via the EDI interface, 76% of FT FOCs were received within three hours<sup>7</sup>. The remaining 24% were received within 10 hours.

< 3 hrs	3-4 hrs	4-6 hrs	6-10 hrs	TOTAL
62	9	3	8	82
75.6%	11.0%	3.7%	9.8%	100%
Total Late = 24.4%				

The following table provides detail on the late FT FOCs received.

PON	VER	CC	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Response	EDI Translator Time
R013H12PEN100001	0 0	9992	5/1/2000 5:02:54 PM	5/1/2000 8:20:55 PM	X			Disagree, BellSouth sent the FOC at 19.13 which is 2hrs and 58 mins from the received time of 16.15	NA
R027B11PEN000003	0 0	9990	3/29/2000 4:32:18 PM	3/29/2000 8:12:34 PM	X			Disagree, BellSouth sent the FOC at 18.45 which is 1hr and	200003291906 03/29 7:06p.m.

<sup>7</sup> The Georgia Public Service Commission (GPSC) standard for purposes of this evaluation, adopted on June 6, 2000, is 95% of FT FOCs received within 3 hours.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78

PON	V P R	CG	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Response	EDI Translator Time
								39 mins from the received time of 17.06	
R001A12PEN100003	0 0	9990	2/28/2000 4:17:47 PM	2/28/2000 7:19:24 PM	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30	200002281759 02/28 5:59p.m.
R005E22PEN100003	0 0	9990	2/28/2000 4:18:57 PM	2/28/2000 7:19:24 PM	X			Disagree, BellSouth sent the FOC at 16.48 which is 18 mins from the received time of 16.30	200002281759 02/28 5:59p.m.
R005A12PEN100003	0 0	9992	3/17/2000 4:47:48 PM	3/17/2000 8:18:15 PM	X			Disagree, BellSouth sent the FOC at 16.26 which is 26 mins from the received time of 16.00	200003171908 03/17 7:08p.m.
R005A12PEN100004	0 0	9992	3/17/2000 4:50:23 PM	3/17/2000 8:18:15 PM	X			Disagree, BellSouth sent the FOC at 16.17 which is 17 mins from the received time of 16.00	200003171908 03/17 7:08p.m.
R011C22PEN100012	0 1	9992	5/18/2000 5:11:15 PM	5/18/2000 9:00:50 PM	X			Disagree, BellSouth sent the FOC at 19.33 which is 2 hrs and 47 mins from the received time of 16.46	NA
R017A11PEN000005	0 0	9991	3/29/2000 4:30:35 PM	3/29/2000 8:05:15 PM	X			Disagree, BellSouth sent the FOC at 17.47 which is 41 mins from the received time of 17.06	200003291853 03/29 6:53p.m.
R013A12PEN100001	0 0	9990	3/30/2000 11:09:15a m	3/30/2000 2:53:10 PM	X			Disagree, BellSouth sent the FOC at 13.12 which is 41 mins from the received time of	200003301334 03/30 1:34p.m.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78

PON	IN R	CC	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Response	EDI Translator Time
								12.00	
R001X12PEN100001	0 0	9990	2/24/2000 2:16:12 PM	2/24/2000 6:33:51 PM		X		Disagree, BellSouth sent the FOC at 16.41. which is 2hrs and 41 mins from the received time of 14.00	200002241724 02/24 5:24p.m.

# BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78

PON	VE R	CC	ISR Sent	FOC Rcvd	3-4 hrs	4-5 hrs	6-10 hrs	Response	EDI Translator Time
R013A22PEN100001	01	9991	2/25/2000 8:57:11 AM	2/25/2000 2:57:31 PM		X		Disagree, BellSouth sent the FOC at 11.26 which is 26 mins from the received time of 11.00	200002251348 02/25 1:48p.m.
R005A12PEN100007	00	9992	3/17/2000 4:56:46 PM	3/17/2000 9:56:10 PM		X		Disagree, BellSouth sent the FOC at 19.47 which is 17 mins from the received time of 19.30	200003172047 03/17 8:47p.m.
R001A21PEN100001	00	9990	2/18/2000 1:22:58 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.01 which is 25 mins from the received time of 20.26	200002182044 2/18 8:44p.m.
R005E22PEN100001	00	9991	2/18/2000 1:26:55 PM	2/18/2000 10:34:55 PM			X	Disagree, BellSouth sent the FOC at 20.32 which is 31 mins from the received time of 20.01	200002182129 2/18 9:29p.m.
R010A12PEN100003	00	9991	2/18/2000 1:30:32 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01	200002182044 2/18 8:44p.m.
R027A11PEN100005	00	9991	2/18/2000 1:37:40 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01	200002182044 2/18 8:44p.m.
R001A12PEN100001	00	9991	2/18/2000 3:53:05 PM	2/18/2000 9:56:36 PM			X	Disagree, BellSouth sent the FOC at 20.26 which is 25 mins from the received time of 20.01	200002182044 2/18 8:44p.m.
R007D11PEN100003	00	9991	2/25/2000 8:38:30 AM	2/25/2000 2:57:31 PM			X	Disagree, BellSouth sent the FOC at 11.26	200002251348 2/25 1:48p.m.

**BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78**

									which is 49 mins from the received time of 10.37	
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## BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 78

PON	VE R	CC	LSR Sent	FOC Rcvd	3-4 hrs	4-6 hrs	6-10 hrs	Response Time	EDI Translator Time
R005A12PEN100010	00	999 2	3/17/2000 5:00:34 PM	3/18/2000 4:17:57 AM			X	Disagree, BellSouth sent the FOC at 20.56 which is 1 hr and 26 mins from the received time of 19.30	200003180305 3/18 3:05a.m.
R005A22PEN100002	02	999 3	3/27/2000 2:59:10 PM	3/28/2000 12:00:44 AM			X	Disagree, BellSouth sent the FOC at 15.32 which is 1 hr and 2 mins from the received time of 14.30	200003272249 3/27 10:49p.m.

## Impact

The absence of timely FOCs will impact CLECs in the following way:

**Decrease in Customer Satisfaction.** Receiving timely FOCs is a critical factor for a CLEC to process an end-user's service request. Delays in the return of a FOC will slow a CLEC's ordering process and delay delivery of service to the end-user. If a CLEC is unable to deliver service to an end-user in a timely fashion, customer satisfaction will decrease.

## BellSouth Response

BellSouth's responses to the individual occurrences have been incorporated into the above table.

### Time Stamp of Resends With Tag Listener Problems:

PON 602A214PTJ100002 Resent 02/09 11:45, 12:15, 16:45  
02/10 05:16, 09:46

## Posted Ack

02/10 09:47

PON 603A22PTJ100004      Return Feed 02/09/00 16:32, 17:15  
Posted Ack 09:47

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 112



January 24, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

### Exception:

**BellSouth does not have a process for returning acknowledgments or tracking manually-submitted (via e-mail and facsimile) Loop Make-Up Service Inquiry (LMU/SI) pre-order queries or Local Service Request Service Inquiries (LSR/SI).**

KPMG Consulting LLC (KCL) did not receive an acknowledgement from BellSouth in response to 99% of 84 manually-submitted (via fax or e-mail) LMU Service Inquiries or LSR/SIs<sup>1</sup>.

KCL has been unable to verify BellSouth's receipt of LMU/SIs and LSR/SIs submitted through the manual process due to the absence of an acknowledgement process.

Additionally, KCL found no formal process to track the status of LMU/SIs or LSR/SIs after submission to either the BellSouth Complex Resale Support Group (CSRG) or Local Carrier Service Center (LCSC).

### Impact

The absence of an acknowledgement or tracking process for LMU/SIs and LSR/SIs will impact CLECs in the following ways:

- **Decrease in customer satisfaction.** The inability to confirm receipt or track LMU/SIs and LSR/SIs after submission may create confusion regarding the status of a submission, which, in turn, may delay the ordering and provisioning of xDSL services. This will negatively impact CLEC customer satisfaction.
- **Increase in operating costs.** CLECs will also likely incur additional costs associated with researching the status of particular LMU/SIs.

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<sup>1</sup> On August 9, 2000 KPMG Consulting LLC received an LSR Receipt Acknowledgement for PON X0R02A from the CSRG via facsimile.

## **BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 112**

### **BellSouth Response**

Effective September 11, 2000 the CRSG will acknowledge all Service Inquiries/LSR received via e-mail or fax.

The CRSG currently sends daily, a manual "OPEN PON STATUS REPORT" to CLECs to give them a status on their PONs. This report provides the date the SI was received in the CRSG, the date the SI was sent to the SAC, and the date the SI was forwarded to the LCSC. It also gives the CLEC the date the SI was placed in and out of clarification and any applicable notes, pertaining to the clarification. CLECs can gain access to this report by following the instructions provided in the BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guides for Loop Makeup found at [www.interconnection.bellsouth.com/guides/bpobr](http://www.interconnection.bellsouth.com/guides/bpobr). The CLEC should send an email to [crsg.une@bridge.bellsouth.com](mailto:crsg.une@bridge.bellsouth.com) and request to be included on the daily Open PON Status Report.

### **BellSouth's Amended Response**

BellSouth will add the Functional Acknowledgement process for LMU SIs to the BellSouth Loop Makeup Preordering & Ordering guide for Manual Loop Makeup document, targeted for posting on 1/31/01. It can be accessed via the following link: [www.interconnection.BellSouth.com/guides/bpobr.html](http://www.interconnection.BellSouth.com/guides/bpobr.html)

# BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 113



Date: January 31, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

### Initial Exception:

**BellSouth-reported raw data values for Commitment Date for the KCL Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Service Order numbers and Purchase Order numbers for six Provisioning metrics.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL compared the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals, Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices, Percent Missed Installation Appointments, Average Completion Interval / Order Completion Interval Distribution, Average Completion Notice Interval, and Total Service Order Cycle Time* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)<sup>2</sup> that KCL received from Hewlett Packard for March, April, and May 2000.

KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers. Table 1 shows the specific discrepancies for Commitment Date.

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<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

# BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 113

**TABLE 1—COMMITMENT DATE**

PON	SO_NBR	MONTH	BLS-REPORTED VALUE	KCL-REPORTED <sup>3</sup> VALUE
R010A11PTN100001	CO0VJ7L2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PEN100003	CO24RH11	March	3/21/00 12:00 AM	03/24/00 12:00 AM
R002A11PEN100003	CO270WV2	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R002A11PTN101002	COBV58F5	March	3/23/00 12:00 AM	03/27/00 12:00 AM
R002A11PEN100005	CP0X8M92	March	3/21/00 12:00 AM	03/27/00 12:00 AM
R010A11PTN100004	CP4CF625	March	3/21/00 12:00 AM	03/23/00 12:00 AM
R002A11PEN100001	CP5QH432	March	3/21/00 12:00 AM	03/28/00 12:00 AM
R002A11PTN100004	CP86GNN9	March	3/23/00 12:00 AM	03/28/00 12:00 AM
424A314PTJ000001	NO26B2P9	March	2/16/00 12:00 AM	03/01/00 12:00 AM
422A114PEJ101001	NOBJDYR1	March	2/18/00 12:00 AM	03/03/00 12:00 AM
615A122PTH102014	CP7R0531	April	4/27/00 12:00 AM	04/25/00 12:00 AM
R047A11PTN000018	NO4Y4Y46	April	4/27/00 12:00 AM	04/18/00 12:00 AM
378A315PEI001001	NP0FNX10	April	3/29/00 12:00 AM	03/23/00 12:00 AM
R041A21PTN100006	NP9V5K27	April	4/12/00 12:00 AM	04/17/00 12:00 AM
R041A21PEN100007	NPF01H46	April	4/12/00 12:00 AM	04/21/00 12:00 AM
R041B21PEN100001	NPF1MLT2	April	4/11/00 12:00 AM	04/17/00 12:00 AM
311F212PEH102002	CO2MXTV7	May	5/11/00 12:00 AM	05/10/00 12:00 AM
R036A22PTN000003	COVQ5886	May	5/1/00 12:00 AM	04/27/00 12:00 AM
R041A12PEN100009	NO0VF3L7	May	5/17/00 12:00 AM	05/18/00 12:00 AM
301A212PEH101016	NO2WDK96	May	5/5/00 12:00 AM	04/14/00 12:00 AM
301A212PTH102014	NO831LW8	May	12/29/00 12:00 AM	04/18/00 12:00 AM
398A213PEM000003	NP02RM89	May	5/2/00 12:00 AM	04/28/00 12:00 AM
378A315PEI001001	NP0FNX10	May	12/29/00 12:00 AM	03/23/00 12:00 AM
R041A12PEN100012	NP8HRNF6	May	5/12/00 12:00 AM	05/19/00 12:00 AM
305A122PTH105001	NP9MJXD8	May	5/8/00 12:00 AM	04/25/00 12:00 AM

## Amended Exception:

**Revised BellSouth-reported raw data values for Commitment Date for the KCL Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for three Provisioning metrics.**

KCL received revised raw data from BellSouth. KCL compared these revised raw data to the KCL-collected data.

KCL could not match the revised BellSouth-reported values with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 2 shows the specific discrepancies for Commitment Date.

<sup>3</sup> These values are contained in response files provided to KCL by HP.

# BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 113

**TABLE 2—COMMITMENT DATE**

PON	SO_NBR	RAW DATA FILE	BLS REPORTED VALUE	KCL REPORTED VALUE	MONTH
303A222PEH101001	CO6TFTB9	JPDY	3/3/00	2/29/00	March
428A124PTJ100012	NO4HLD96	JPDY	12/30/00	2/21/00	March
406C213PTM100002	NO9HBW68	JPDY	12/30/00	1/21/00	March
428A224PTJ100009	NOBC0M48	JPDY	12/29/00	2/22/00	March
422A114PEJ101001	NOBFJ3F3	JPDY	3/3/00	2/18/00	March
302A312PEH000003	NOBQ1C99	JPDY	3/2/00	2/29/00	March
403A223PTM100003	NP32R9P9	JPDY	12/30/00	2/15/00	March
607A214PEJ102001	NP74MLL1	HO	2/16/00	12/30/00	March
422A114PEJ101001	NOBJDYR1	PMI	2/18/00	3/3/00	March
424A314PTJ000001	NO26B2P9	PMI	2/16/00	3/1/00	March
R002A11PEN100001	CP5QH432	PMI	3/21/00	3/28/00	March
R002A11PEN100003	CO270WV2	PMI	3/21/00	3/27/00	March
R002A11PEN100005	CP0X8M92	PMI	3/21/00	3/27/00	March
R002A11PTN100004	CP86GNN9	PMI	3/23/00	3/28/00	March
R002A11PTN101002	COBV58F5	PMI	3/23/00	3/27/00	March
R010A11PEN100003	CO24RH11	PMI	3/21/00	3/24/00	March
R010A11PTN100001	CO0VJ7L2	PMI	3/21/00	3/27/00	March
R010A11PTN100004	CP4CF625	PMI	3/21/00	3/23/00	March
R041A21PEN100007	NPF01H46	PMI	4/12/00	4/21/00	April
R041A21PTN100006	NP9V5K27	PMI	4/12/00	4/17/00	April
R041B21PEN100001	NPF1MLT2	PMI	4/11/00	4/17/00	April
378A315PEI001001	NP0FNX10	PMI	3/29/00	3/23/00	April
R041A12PEN100012	NP8HRNF6	PMI	5/12/00	5/19/00	May

## **BellSouth's Amended Response:**

BellSouth and KCL have had several conference calls to investigate the discrepancy between BellSouth reported raw data values for Commitment Date for KCL Test CLEC and KCL collected values.

When KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date) that KCL received from Hewlett Packard for March, April, and May 2000, KCL could not match the BellSouth-reported values in these fields with the corresponding KCL-collected values for certain service order numbers and purchase order numbers.

## BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 113

On September 29<sup>th</sup>, it was determined that the Test CLEC data KCL downloaded from the PMAP website for the months of March, April, and May, may not have been accurate as the reports had been rerun since that time.

On September 29<sup>th</sup>, KCL issued a data request for the following new updated raw data files for the KCL Test CLEC for March, April, and May:

- (a) Average Completion Notice Interval
- (b) Held Orders
- (c) Jeopardy Notice Interval
- (d) Order Completion Interval Distribution for Trunks & Non-Trunks
- (e) Percent missed Installation Appointments for Trunks & Non-Trunks
- (f) Total Service Order Cycle Time
- (g) Troubles within 30 days of Provisioning Trunks & Non-Trunks

BellSouth sent the updated raw data to KCL on 10/02/00 for the Data Comparison Test for ordering & Provisioning SQMs.

On November 7<sup>th</sup>, KCL sent to BellSouth a list of PONs from the various Provisioning raw data files - Mean Held Order Interval and Distribution Intervals (HO), Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY), Percent Missed Installation Appointments (PMI), Average Completion Interval / Order Completion Interval Distribution (OCI), Average Completion Notice Interval (ACNI), and Total Service Order Cycle Time (TSOCT)- from March-Sept 2000, where KCL could not match the service order numbers.

In KCL's second amended Exception 113, KCL reported that BellSouth values for the Commitment Date (CMTT\_DATE) do not match KCL Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for Provisioning Metrics for PMI, Jeopardy, and Held Order.

### PMI:

As per the "Business Requirements" section of the SQM for Percent Missed Installation Appointments, the first CMTT\_DATE (original due date) on the service order is used in the PMI calculation. Records with a SO\_CMTT\_TYPE\_CD = 1 represent the original due date (CMTT\_DATE) for a service order. The exclusion criteria, which only selects records with a SO\_CMTT\_TYPE\_CD = 1, is included as part of the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure.

In addition, KCL requested further clarification of the record with a SO\_NBR = NP0FNX10. This particular record has a BellSouth-reported value for the commitment date of 3/29/00, and a KLC-reported value for the commitment date of 3/23/00. The history tables in the raw data file indicate that the original due date

## BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 113

(SO\_CMTT\_TYPE\_CD = 1) is 3/29/00 and the subsequent due date  
(SO\_CMTT\_TYPE\_CD = 2) is 3/23/00. KCL asked BellSouth to provide an explanation  
for this case in which the subsequent due date is earlier than the original due date.

BellSouth was able to retrieve history for this record from MOBI, which provides SOCS  
historical data. The data from MOBI confirms that the subscriber requested an earlier  
commitment date. This is reflected by the SP (subscriber requested previous due date)  
code that precedes the 3/23/00 date in the following MOBI snapshot:

MOBI 706 U57 0677 04 / 16 / 00 NP0FNX10 CPX2371 ORDER DISPLAY  
ARC IS NOW ON ACF2 SECURITY. USE YOUR ACF2 PASSWORD TO SIGNON!!!  
POFS

706-U57-0677 677 BILL DATE 04-16-00 NP0FNX10 CPX2371

PAGE 1

CPX706291BO N N  
706 U57-0677 67720000418ROME20000310133220000310  
NP0FNX10P8 UEANLYAXQA2R20000329 LSL  
ZRTI \$,QS,800 872-3116,LW,770986  
FDT 900P  
IAECN9992, UEANL  
ICENTS0Y  
SPO M3Y13  
PRN GALZXC1001  
CRO DP1WJ4T8, NP604RH3, CP7W2TD8  
CRO CPDWMDQ2  
RRSO DP1WJ4T8  
SD 12-29-00 SP  
SD 03-23-00 SL  
SD 12-29-00 SP  
SD 04-18-00

---LIST

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MORE...

PF2=SEARCH PF3=DISPLAY PF4=PRINT PF6=FAX  
PF7=MAIN PF8=SCROLL PF11=BACK PRINTER ID:

### Jeopardy:

The Jeopardy record, SO\_NBR = NO9HBW68 was cancelled. BellSouth's standard  
practice for handling cancelled orders is to assign a null value to the CMPLTN\_DT field.  
A documentation snapshot from the LEO source system has been provided below to  
provide a record of what occurred with this record prior to it reaching Jeopardy raw data.  
Below is a copy of the LEO Archive screen showing the create date and the date the  
information was rejected to the CLEC. This date is marked in red.



## BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 113

CC: 9994 PON: 406C213PTM100002 ENTER "X" FOR ON SIT

X	VER	CREATE	REJECT	ARCHIVED	PURGE
		DATE	NUMBER	DATE	DATE
_00		2000-01-11	_____	2000-08-19	2003-08-19
_02		2000-01-17	_____	2000-08-19	2003-08-19
_03		2000-02-18	___1	2000-08-19	2003-08-19

As per the RDUM procedures for Jeopardy Interval and Percent Jeopardy, the latest CMTT\_DATE in a group of records must be within the given reporting month. If it does not fall within the given month, the entire group of records should be excluded. Additionally, if the latest CMTT\_DATE is within the reporting month, the rest of the records in the group should be excluded.

The three Jeopardy records (SO\_NBR in 'NO4HLD96', 'NOBC0M48', 'NP32R9P9') have CMTT\_DATE reported in February, thus not affecting the March calculation of the Jeopardy measure.

The remaining three records can be explained using the logic that if the latest CMTT\_DATE is within the reporting month, exclude the rest of the records in the group. The three Jeopardy service orders addressed by KCL, are capturing a CMTT\_DATE prior to the latest CMTT\_DATE and from a previous month. This CMTT\_DATE should be dropped and replaced with the latest CMTT\_DATE in the current month. Exclusion criteria from the Raw Data User's Guide, used to capture the records included in the Jeopardy measure, were applied directly to the raw data after it was cut from NODS.

### **Held Order:**

For this held order record (SO\_NBR = NP74MLL1) the number reported by BLS for the CMTT\_DATE was 2/16/00, and the value reported by KCL was 12/30/00. According to the commitment history, the original date was 2/16/00 and then it was scheduled later to 12/30/00. This could be due to a variety of reasons, but most likely, the order was held off until further notice, so the date was scheduled far in the future.

Held Order Processing Methodology states that the last due date that carries a company missed appointment code and does not have a subsequent due date should be captured. The held interval is measured as the reporting period end date back to the first company missed date on the service order.

The date that should be captured is the original date. Therefore the date of 2/16/00 is the correct date.

## BELLSOUTH'S RESPONSE TO EXCEPTION 121



Date: January 16, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12).

#### Exception:

**BellSouth's manual ordering documentation does not contain references to decline CLEC requests to Related Purchase Order Number (RPON) designed with non-designed services.**

#### Summary of Exception:

BellSouth's manual ordering documentation does not indicate that RPONing a designed order with a non-designed order is not possible.

KPMG Consulting LLC (KCL) attempted to submit orders that were designed (xDSL capable loop) with a related purchase order number that was non-designed (SL1 Loop). KCL received clarifications that "RPON cannot be used to relate to another LSR that does not require a Service Inquiry."

KCL requested further information regarding these clarifications via the Help Desk Log. BellSouth responded back: "Per LEO-IG, Vol 1, 4.3.1.40, RPON-**Note 13**: If LSR requires a Service Inquiry, RPON can not be used to relate another LSR that does not require a Service Inquiry; SL1-Non Designed Loop does not require a Service Inquiry; SL2-Designed Loop requires a Service Inquiry."

KCL is presently using CG-LEOO-009 Issue 9H and there is no reference stating the inability to submit such an order.

Examples of submitted orders and their RPONS are:

PON	RPON
X001B21001	X001BR21001
X001B21003	X001BR21003
X001B21004	X001BR21004
X001A21011	X001R21011

## **BELLSOUTH'S RESPONSE TO EXCEPTION 121**

### **Impact:**

The inability to RPON orders for the same end-user customer leads to increased cost for the CLEC. The CLEC will then be responsible to send two orders and then coordinate the provisioning dates for the service to be provided.

### **BellSouth Response:**

The BellSouth Business Rules document was updated on 12/22/00 to add Note 13 (as stated above) to the RPON field.

# BELLSOUTH'S RESPONSE TO EXCEPTION 125



January 10, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Ordering Functional Evaluations (O&P-1 and O&P-2).

### Exception:

**BellSouth's process for generating Completion Dates (CN DDs) for Local Service Requests (LSRs) may result in inaccuracies between the CN DD provided to the CLEC and the actual date of service completion.**

BellSouth delivers CNs upon the conclusion of "field provisioning"<sup>1</sup> activities as well as all subsequent downstream (listing and billing) provisioning activities<sup>2</sup>. Within the CN, BellSouth provides the field provisioning completion date (located in the 'DD' field). Regardless of downstream errors encountered during the provisioning process and the time at which the CN response is actually transmitted, the CN DD field should accurately represent the actual date of service provisioning.

Based on discussions with BellSouth, KPMG Consulting LLC (KCL) believes BellSouth's process for generating CN DDs is inaccurate.

- For Local Number Portability (LNP) service requests, the CN DD field appears to be populated with the date on which the CN was sent. This is not always the date on which the service provisioning actually completed.
- For non-LNP service requests, BellSouth populates the CN DD with the completion date from the first internal service order. For some service requests, BellSouth generates multiple internal service orders. On occasion, these service orders may not complete on the same day. As a result, the CLEC could receive a CN DD that is earlier than the actual completion date.

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<sup>1</sup> The "field provisioning" date is defined as the date on which actual service completion occurred.

<sup>2</sup> For Local Number Portability (LNP) orders, BellSouth returns CNs following all provisioning activities and after the CLEC completes the porting of associated Telephone Numbers with the Number Portability Administration Center (NPAC).

## **BELLSOUTH'S RESPONSE TO EXCEPTION 125**

### **Impact:**

The absence of accurate information for Completion Notifications prevents a CLEC from maintaining an accurate current status of its customers' requested services and may impede the timing of maintenance and billing activities.

### **BellSouth Response**

BellSouth has opened defect 3078 to correct the due date populated in completion notification for LNP orders. The defect will be prioritized and implemented in a future software release.

BellSouth has opened feature 11920 to wait until all applicable service orders are completed prior to sending completion notification for non-LNP orders. The feature will be prioritized and implemented in a future software release.

CLECs may continue to obtain service order status by using the BellSouth's CLEC Service Order Tracking System (CSOTS). CSOTS provides CLECs with service order status including completion.

# BELLSOUTH'S RESPONSE TO EXCEPTION 126



January 10, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Test (PO&P-13).

### Exception:

**BellSouth's provisioning completion activities for xDSL orders are not consistent with the confirmation due date provided on the Firm Order Confirmation (FOC).**

As part of testing, KPMG Consulting LLC (KCL) evaluated BellSouth's ability to complete the provisioning of orders on the confirmed due date.

Of the 87 orders KCL reviewed for provisioning timeliness, 10 orders (12%) were not completed on the confirmed due date provided by BellSouth on the FOC.

The following table provides details regarding this issue.

PO#	Ver	FOC DD	CN DD	Req/Act	OCN/Resh	BellSouth Response
X001A110002	0	09/1/00	09/6/00	AV	9992	Agree Due date was changed due to Central Office freeze FOC with new date was not sent. Service Rep will be covered by 1/16/01.
X001A11003	0	10/16/00	10/17/00	AV	9991	Disagree Customer gave wrong telephone number to ANAC. Tech called DSGCON on order. Turn up was accepted as is and completed by Tech.
X001A11006	0	10/2/00	11/1/00	AV	9994	Agree Order was CP on 11-01 due to invalid Technician Assignment UNEC Manager covered Technician on 1/09/01
X001A12004	0	10/3/00	10/17/00	AV	9994	Agree Order was PF'd. FOC with new due date was not sent. Service Rep will be covered by 1/16/01.
X039A11003	0	10/02/00	10/09/00	AN	9991	Agree Order was PF'd. FOC with new due date was not sent. Service Rep will be covered by 1/16/01.

## BELLSOUTH'S RESPONSE TO EXCEPTION 126

PON	Ver	FOC DD	CN DD	Req/Act	OCN/Resh	BellSouth Response
X039BR11001	0	09/21/00	9/25/00	AN	9994	Agree Due date changed due to incorrect central office assignments on order. Tech will be covered by 1/16/01.
X039B11003	0	10/02/00	10/03/00	AN	9991	Agree Due date changed to 10-03-00. Company failed to dispatch on due date. Center manager covered on 1/9/01.
X039B11008	0	10/04/00	10/05/00	AN	9994	Agree Due date changed to 10-05-00 CLEC not available. Default close out not used. Tech covered on 1/9/01.
X039B11009	0	10/02/00	10/20/00	AN	9994	Disagree LSR was dated 10-10 and was received in the LCSC on 10-11 FOC sent 10-12 with a due date of 10-20.
X046A11005	0	09/29/00	10/02/00	AB	9994	Disagree CLR was sent after FOC due to incorrect cable and pair provided by KPMG. KPMG failed to send SUP to provide correct data. PON was canceled after 14 days in clarification. Service order was not canceled. Service rep will be covered 1/16/01.

### Impact:

Lack of timely provisioning will affect CLECs in the following ways:

- **Decreased customer satisfaction.** If a CLEC's order is not provisioned in a timely fashion, the CLEC's customer will not receive the service as scheduled. This will result in a decrease in CLEC customer satisfaction, and possibly the loss of the customer's business.
- **Increase in operating costs.** If a CLEC is prepared to convert a customer's service and BellSouth does not complete provisioning activities as scheduled, CLECs must re-allocate resources to these activities. In effect, this means a CLEC will have to prepare for the conversion more than once. This will increase CLEC operating costs.

### BellSouth Response

BellSouth's Responses to the individual occurrences have been incorporated into the above table. BellSouth disagrees with 3 of the 10 issues, which would lower the error rate to 8%.

## BELLSOUTH'S RESPONSE TO EXCEPTION 127



Date: January 8, 2001

### EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

#### Exception:

**BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals (HO)*, *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)<sup>2</sup> that KCL received from Hewlett Packard for June through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Commitment Date.

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.



# BELLSOUTH'S RESPONSE TO EXCEPTION 127

**TABLE 1—COMMITMENT DATE**

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS-REPORTED VALUE	KCL-REPORTED VALUE	MONTH
R025H11PTN100010	TOX2M187	PMI	6/19/00	6/22/00	June
423A114PTM100006	NOFGGB38	JPDY	7/6/00	3/30/00	July
B100001PEJ101069	NP5M4544	JPDY	8/4/00	7/31/00	August
307R122PTH003001	COFJRG75	PMI	9/21/00	9/28/00	September
307R222PTH100002	CO05B5R9	PMI	9/21/00	9/26/00	September
454R126PEF001001	RPP18373	PMI	9/11/00	9/9/00	September

## **BellSouth Response:**

**KPMG reported that BellSouth reported values for the Commitment Date (CMTT\_DATE) do not match KPMG Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.**

**The first Provisioning metric, PMI, requires that the first CMTT\_DATE (original due date) on the service order be used for the PMI calculation. For example:**

Service Order CO05B5R9 has two records, the first record with an original due date (SO\_CMTT\_TYPE\_CD = 1) CMTT\_DATE = 9/21/00, and the second record with a subsequent due date (SO\_CMTT\_TYPE\_CD = 2) CMTT\_DATE = 9/26/00. **PMI requires that the first CMTT\_DATE (original due date) on the service order be used for the PMI calculation. Records with a SO\_CMTT\_TYPE\_CD = 1 represent the original due date (CMTT\_DATE) for a service order. The exclusion criteria, which only selects records with a SO\_CMTT\_TYPE\_CD = 1, is included as part of the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure. In this example, the second record with CMTT\_DATE = 9/26/00 should be excluded.**

**The second Provisioning metric, Jeopardy, requires that the latest CMTT\_DATE in a group of records be within the given reporting month. If it does not fall within the given month, the entire group of records should be excluded. Additionally, if the latest CMTT\_DATE is within the reporting month, exclude the rest of the records in the group. The two Jeopardy service orders addressed by KCL, are capturing a CMTT\_DATE prior to the latest CMTT\_DATE and from a previous month. This CMTT\_DATE should be dropped and replaced with the latest CMTT\_DATE in the current month. Exclusion criteria from the Raw Data User's Guide, used to capture the records included in the Jeopardy measure, were applied directly to the raw data after it was cut from NODS.**

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 127



Date: January 31, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

### Exception:

**BellSouth-reported raw data values for Commitment Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Mean Held Order Interval and Distribution Intervals (HO)*, *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMMITMENT DATE in the raw data files with the due date (commitment date)<sup>2</sup> that KCL received from Hewlett Packard for June through September 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain purchase order numbers and service order numbers. Table 1 lists the purchase order numbers specific discrepancies for Commitment Date.

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Commitment Date is the due date indicated in the FOC that is received by HP and provided to KCL.

# BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 127

**TABLE 1—COMMITMENT DATE**

PON	SERVICE ORDER NUMBER	RAW DATA FILE	BLS-REPORTED VALUE	KCL-REPORTED VALUE	MONTH
R025H11PTN100010	TOX2M187	PMI	6/19/00	6/22/00	June
423A114PTM100006	NOFGGB38	JPDY	7/6/00	3/30/00	July
B100001PEJ101069	NP5M4544	JPDY	8/4/00	7/31/00	August
307R122PTH003001	COFJRG75	PMI	9/21/00	9/28/00	September
307R222PTH100002	CO05B5R9	PMI	9/21/00	9/26/00	September
454R126PEF001001	RPP18373	PMI	9/11/00	9/9/00	September

## BellSouth's Amended Response:

KPMG reported that BellSouth reported values for the Commitment Date (CMTT\_DATE) do not match KPMG Consulting LLC (KCL) Test CLEC values for certain Purchase Order numbers and service order numbers for two Provisioning metrics.

### PMI

As per the "Business Rules section of the SQM for Percent Missed Installation Appointments, the first CMTT\_DATE (original due date) on the service order is used in the PMI calculation. For example:

Service Order CO05B5R9 has two records, the first record with an original due date (SO\_CMTT\_TYPE\_CD = 1) CMTT\_DATE = 9/21/00, and the second record with a subsequent due date (SO\_CMTT\_TYPE\_CD = 2) CMTT\_DATE = 9/26/00. PMI requires that the first CMTT\_DATE (original due date) on the service order be used for the PMI calculation. Records with a SO\_CMTT\_TYPE\_CD = 1 represent the original due date (CMTT\_DATE) for a service order. The exclusion criteria, which only selects records with a SO\_CMTT\_TYPE\_CD = 1, is included as part of the program code used to generate/cut PMI raw data. The RDUG is consistent with the stored procedure code used to assemble the PMI raw data file. This exclusion does not affect the calculation of the PMI measure. In this example, the second record with CMTT\_DATE = 9/26/00 should be excluded.

In addition, KCL requested further clarification of the record with a SO\_NBR = RPP18373. This particular record has a BellSouth-reported value for the commitment date of 9/11/00, and a KLC-reported value for the commitment date of 9/9/00. The history tables in the raw data file indicate that the original due date (SO\_CMTT\_TYPE\_CD = 1) is 9/11/00 and the subsequent due date (SO\_CMTT\_TYPE\_CD = 2) is 9/9/00. KCL asked BellSouth to provide an explanation for this case in which the subsequent due date is earlier than the original due date. BellSouth was able to retrieve history for this record from MOBI, which provides SOCS historical data. The data from MOBI shows that this record was incorrectly assigned a SL (subscriber requested a later due date) code. This SL (subscriber requested later due

## BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 127

date) code precedes the 9/9/00 date in the MOBI snapshot found below. The Service Representative who handled this report made a data entry error and should have assigned the 9/9/00 date the SP (subscriber requested previous due date) code instead of the SL code. At the time that this order was processed, the SOCS system did not possess the ability to alert the user that a subsequent due date earlier than the original due date had been entered. This problem has been addressed, and an edit was made to the system as of January 1, 2001 to ensure that this data entry error will not occur in the future.

M O B I 912 745 2939 939 09 / 08 / 00 RPP18373 CPX2472 ORDER  
DISPLAY  
ARC IS NOW ON ACF2 SECURITY. USE YOUR ACF2 PASSWORD TO SIGNON!!!  
POFS  
912-745-2939 939 BILL DATE 09-08-00 RPP18373 CPX2472

PAGE 1  
CPX912745AN NNN  
912 745-2939 93920000909MCN 20000906165720000906  
RPP18373 I1 UEPRXYAXQAX520000911 SL  
ZRTI \$,QS,800 872-3116,KM  
CENT ROY  
AECN 9990, UEPRX  
SD 09-09-00  
---LIST  
ILN GEORGIA, HILTON  
ONP (NON-PUB) GEORGIA, R W H  
LA 787 CHERRY ST  
SA 787 CHERRY ST, MCN, GA  
LOC FLR 3;RM 300  
---BILL  
TAR 203,811  
MAN U9990  
IPON 454R126PEF001001  
PAGE 1 OF 1  
MORE...  
PF2=SEARCH PF3=DISPLAY PF4=PRINT PF6=FAX  
PF7=MAIN PF8=SCROLL PF11=BACK PRINTER ID:

### JEOPARDY

As per the RDUM procedures for Jeopardy Interval and Percent Jeopardy, the latest CMTT\_DATE in a group of records must be within the given reporting month. If it does not fall within the given month, the entire group of records should be excluded. Additionally, if the latest CMTT\_DATE is within the reporting month, the rest of the records in the group should be excluded.

The two Jeopardy service orders addressed by KCL, are capturing a CMTT\_DATE prior to the latest CMTT\_DATE and from a previous month. This CMTT\_DATE should be dropped and replaced with the latest CMTT\_DATE in the current month. Exclusion criteria from the Raw Data User's Guide, used to capture the records included in the Jeopardy measure, were applied directly to the raw data after it was cut from NODS.

# BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 128



Date: January 10, 2001

## EXCEPTION REPORT

An exception has been identified as a result of the Data Comparison test for Ordering & Provisioning Service Quality Measurements (SQMs).

### Exception:

**BellSouth-reported raw data values for Completion Date for the KPMG Consulting LLC (KCL) Test CLEC do not match the KCL-collected values for certain Purchase Order Numbers and Service Order Numbers for one Provisioning metric.**

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.<sup>1</sup>

As part of the BellSouth-Georgia OSS Evaluation, KCL is comparing the data that BellSouth uses to produce SQM reports for the KCL test CLEC with the corresponding data that KCL collects using its own test management tools. For each of the Provisioning metrics – *Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices (JPDY)*, *Percent Missed Installation Appointments (PMI)*, *Average Completion Interval / Order Completion Interval Distribution (OCI)*, *Average Completion Notice Interval (ACNI)*, and *Total Service Order Cycle Time (TSOCT)* – KCL compared the BellSouth-reported values for COMPLETION DATE<sup>2</sup> in the raw data files with the completion date that KCL received from Hewlett Packard for October and November 2000.

KCL could not match the BellSouth-reported values in this field with the corresponding KCL-collected values for certain Purchase Order Numbers and Service Order Numbers. The following table lists the specific discrepancies for Completion Date.

<sup>1</sup> These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

<sup>2</sup> Completion Date is the actual date of completion of a service order.

# BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 128

## COMPLETION DATE

PURCHASE ORDER NUMBER	SO_NBR	RAW DATA FILE	BELLSOUTH- REPORTED VALUE	KCL- COLLECTED VALUE	MONTH
324R112PEH000003	CO33BBN0	JPDY	None	10/13/00	October
452R216PTF000002	RP7BNJW8	JPDY	None	10/02/00	October

### Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

### BellSouth Response

BellSouth is currently investigating this exception and will provide a response when the investigation is complete.



## **CLOSURE REPORT FOR EXCEPTION 9**

BellSouth Georgia OSS Testing Evaluation

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Date: February 2, 2001

### **EXCEPTION CLOSURE REPORT**

#### **Exception:**

**BellSouth failed to deliver electronic Firm Order Confirmations (FOCs) and Completion Notices (CNs) in response to electronic service order requests.**

#### **Summary of Exception:**

When a CLEC submits an error-free service request via an electronic interface, BellSouth commits to deliver an electronic FOC response. An FOC response notifies the CLEC that BellSouth has generated an internal service order within its Service Order Communication System (SOCS) and provides the CLEC with a due date on which service will be provided. The CLEC can use this information to confirm that a valid service request has been received and to notify their end-user customer of the service establishment date. Once BellSouth has completed the service order, an electronic Completion Notification (CN) is delivered.

In several instances, KPMG Consulting (KCL) did not receive an electronically-delivered FOC or CN<sup>1</sup> for service orders that BellSouth had generated and completed.

#### **Summary of BellSouth's Response:**

"Specific criteria must be present on an error-free service order for a Firm Order Confirmation and Completion Notice to be sent electronically. The criteria is the following fields must be present on the SOCS service order to trigger a FOC or CN:

AECN (UNE)  
Sales Code begins with "YAXQ"  
PON  
MAN (UNE)  
RESH (RESALE)  
RMKR

On the seven PONs listed above, six failed to meet the criteria for a FOC or CN. BellSouth has not received PON 387A225PEG100001 CC 9992.

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<sup>1</sup> CNs are only expected on orders for which FOCs are received.

## CLOSURE REPORT FOR EXCEPTION 9

BellSouth Georgia OSS Testing Evaluation

Service representatives in the Local Carrier Centers have been retrained on how to properly handle requests that fall out for manual processing to comply with the policy to provide FOCs and CNs within specified timeframes."

On January 15, 2000 BellSouth implemented a system enhancement, Feature 5183 to allow an FOC or CN to be generated when one or more of the above criteria has not been met. BellSouth also enhanced the system to trigger an FOC or CN when RMK, RMKR, IRMK, IRMKR, ORMK, or ORMKR is present on the service order, instead of just RMKR. This process will ensure BellSouth delivers electronic FOCs and CNs in response to electronic Local Service Requests.

### Summary of KCL Re-test Activities:

KCL was unable to design a re-test to specifically replicate the BellSouth omission that initially resulted in a failure to deliver FOCs and CNs. However, KCL did submit several hundred additional transactions during re-testing and encountered numerous error scenarios, in attempt to monitor recurrence of this problem. To re-test this exception, KCL reviewed the electronic response activity to service requests submitted following BellSouth's implementation of Feature 5183<sup>2</sup>.

### KCL Re-test Results:

Of the service requests reviewed by KCL following implementation of Feature 5183, none exhibited occurrences of missing or faxed FOC and CN responses due to BellSouth error.<sup>3</sup> While KCL cannot prove that the absence of missing or faxed FOC and CN responses is a direct result of the implementation of Feature 5183, the evidence suggests that such a conclusion is reasonable.

In closing this exception, KCL notes that relative to the total number of test transactions submitted electronically, faxed responses were received for less than one percent of service requests submitted during the initial test.

**Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 9.**

<sup>2</sup> KCL only reviewed those service requests submitted during the initial testing period. Orders submitted in conjunction with the functional retest initiated on August 25, 2000 have not been included in this review.

<sup>3</sup> While several dozen transactions failed to receive CNs, the cause was attributed to other reasons, and not to the problem that was purportedly corrected with this system fix. These "missing CNs" are addressed in Exception 118.



# **CLOSURE REPORT FOR EXCEPTION 9**

BellSouth Georgia OSS Testing Evaluation

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**Attachments:** None.

Date: February 2, 2001

**EXCEPTION CLOSURE REPORT****Exception:**

**BellSouth's electronic ordering systems (TAG and EDI) do not adequately support CLEC requests for Directory Listings associated with UNE loop customers.**

**Summary of Exception:**

BellSouth's ordering documentation indicates that all data elements associated with the Directory Listing (DL) form on Loop Service (LS) requests (REQ TYPE A) are "Not Applicable".<sup>1</sup> While DL requests associated with other service delivery types (e.g., UNE Port, UNE Loop-Port Combination) can be accommodated on the original service request, DL requests in association with UNE Loop orders are not accepted on the actual Loop transaction.

KPMG Consulting LLC's (KCL's) BellSouth Customer Support Manager (CSM) informed the KCL ordering team that two separate service requests are required for related LS and DL orders. These two service requests are:

1. Loop Service Request - REQ TYPE A
2. Directory Listing Request - REQ TYPE J

KCL's CSM further indicated that in order to coordinate the service establishment dates, these two transactions should be linked utilizing the Related Purchase Order Number (RPON) data element on the service request. According to KCL's CSM, all transactions submitted using the RPON functionality automatically fall out for manual handling.

**Directory Listing for UNE Loop Customers:** The existing BellSouth requirements for ordering LS and DL present a number of deficiencies:

- The LS with DL ordering process is not documented.
- Two separate transactions are required.
- The related transactions result in a more complicated error resolution process. When one transaction within the RPON'd order set (the LS or DL request) is clarified back to the CLEC, the related transaction is subsequently sent back as well, requiring the CLEC to submit 2 supplements.
- Use of the RPON field means the LS request will not flow through<sup>2</sup>.

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<sup>1</sup> BellSouth's *Local Exchange Ordering (LEO) Guide, Volume 1, Issue 7N, January 2000, Section 7.*

<sup>2</sup> BellSouth represented to KCL that UNE Loops with DL are flow-through transactions. However, during testing, KCL discovered that UNE Loop with DL orders are not flow-through.

**Summary of BellSouth's Response:**

Loop service is identified by a circuit number not a telephone number. Therefore, circuit numbers are used to provision and identify customer service records (CSRs) for Loop service. UNE Port (REQTYP F) and UNE Port-Loop Combination (REQTYP M) services are telephone number identified. BellSouth lists only dialable telephone numbers in the directory, not circuit numbers.

Section 2.6 of the LEO-IG, Volume 1, Issue 7O, which was posted March 20, 2000, provides a table that illustrates the ordering requirements for provisioning different types of service requests. The table clearly indicates only fields associated with LSR, EU and Loop forms are applicable for REQTYP A – Loop Service Requests.

If a CLEC wants to associate the loop and directory listing LSRs, they may do so by populating the RPON field. CLECs are not encouraged to use the RPON field to relate Loop and Directory Listing requests. CLECs may simply request the same due date on the Loop and Directory Listing LSRs submitted to BellSouth.

If a CLEC chooses to relate these orders they will fall out to the center for manual handling. In an effort to ensure that RPON'd orders are processed in a timely and efficient manner the process was evaluated, documented and recovered by the center manager. The coverage was completed 04/01/00.

BellSouth assessed the feasibility of allowing changes to a Directory Listing and Loop via a single LSR on 5/5/00 and determined this was not feasible from an operations perspective. Loop requests are identified via a circuit ID, which is not listed in a directory. CLECs should continue to send separate LSRs to request listing changes on Loop service.

**Summary of KCL Re-test Activities:**

In an effort to review the functionality of Loop with DL order types, KCL initiated a transaction re-test on August 25, 2000. During the re-test, KCL submitted 25 service requests for Loops with DL. The orders were distributed across two scenario types based on BellSouth's initial response to this exception:

1. Loop Service and Directory Listing orders were submitted separately using the RPON field to relate the two transactions.
2. Loop Service orders were submitted, and following the receipt of a FOC, Directory Listing orders were submitted requesting the same Due Date as that returned on the Loop Service FOC.

During the course of the re-test, KCL learned that the RPON function was no longer



available for use on Loop Service orders, which BellSouth indicated in an amended response<sup>3</sup>. KCL submitted the remaining Loop Service with DL orders (scenario 2).

**KCL Re-test Results:**

KCL received FOCs for all separate service requests for Loop Service and Directory Listings, indicating that BellSouth ordering systems successfully processed the requests. In addition, KCL did not experience problems obtaining the same confirmed Due Date for DL service as the Due Date received for corresponding Loop Service requests.

While BellSouth electronic ordering systems do not have the ability to handle Loop Service with DL orders on a *single* LSR, the basic functionality to process these orders does exist. KCL believes that the additional effort required to develop two distinct service requests and to coordinate their Due Dates is not a significant impediment to a CLEC's ability to execute these order types.

**Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 31.**

**Attachments:** None.

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<sup>3</sup> This rule is outlined in the *BellSouth Local Exchange Ordering Guide, Issue 7S*.



**ADDENDUM TO THE CLOSURE REPORT  
FOR EXCEPTION 81**

BellSouth Georgia OSS Testing Evaluation

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Date: February 2, 2001

**ADDENDUM TO EXCEPTION CLOSURE REPORT**

**Exception:**

**The ECTA Gateway does not notify CLECs when invalid information is entered into a trouble ticket.**

KPMG Consulting LLC (KCL) filed its Closure Report for Exception 81 on July 21, 2000. In that report KCL stated that based on its testing activities, it would assign a "Not Satisfied" to the relevant evaluation criteria in its final report.

Subsequent to the filing of the Closure Report BellSouth elected to bring the issue to the CLEC community via the Change Control Process, and to make the programming changes if the CLECs requested them. At the October 25, 2000 Change Control Meeting, the CLEC community did not prioritize ECTA attribute validation, and BellSouth cancelled this specific item as an issue to be addressed.

While the lack of data validation limits the functionality of the interface, CLECs have been given an appropriate opportunity to address the issue via the Change Control process and have elected not to proceed with changes to the ECTA Gateway.

**Therefore, KCL is amending its original judgment in the July 21, 2000 Closure Report, and as such will assign a "Satisfied" result for the criterion relating to Exception 81.**

**Attachments: None.**



Date: February 2, 2001

## **EXCEPTION CLOSURE REPORT**

### **Exception:**

Computation instructions provided by BellSouth for *Provisioning – Mean Held Order Interval and Distribution Intervals* are inconsistent with the information provided in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*<sup>1</sup>.

### **Summary of Exception:**

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports<sup>2</sup>.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the instructions provided by BellSouth<sup>3</sup> for computing SQMs to their definitions as documented in the *SQM Reports*<sup>4</sup> in order to assess their consistency.

Computation instructions for *Provisioning – Mean Held Order Interval and Distribution Intervals* prescribe excluding records for which held order duration is greater than 120 days.<sup>5</sup> This exclusion is not listed in the *SQM Reports*.

### **Summary of BellSouth Response:**

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<sup>1</sup> Relevant PMAP SQM information is documented in the Definitions, Exclusions, Calculation and Business Rules sections of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

<sup>2</sup> These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

<sup>3</sup> KPMG used instructions from the *PMAP Raw Data User Manual – Version 2.0.4 – December 15, 1999* and information provided by BellSouth personnel.

<sup>4</sup> KPMG used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version of the *SQM Reports*.

<sup>5</sup> Step 8 of the computation instructions for *Mean Held Order Interval and Distribution Intervals* as published in the 12/15/99 *PMAP Raw Data User Manual* (p.25).

“Rather than adding the exclusion to the SQM, BellSouth will delete the exclusion from the code. Initially the exclusion was used because cancelled orders were not being processed correctly in Held Order. Orders that were actually cancelled continued to appear as Held. Also, duplicate order numbers were being assigned the issue date of one order and the held status of the later order.

Cancelled orders have been processed in PMAP since 1999 and with the implementation of recent change requests that exclude orders with issue dates later than completion dates, BellSouth can now eliminate the code that excludes orders over 120 days, thus eliminating duplicate order numbers where one may be held but the issue date captured is of a previous order. Change requests 5909 and 5911 were implemented 7/15/00 to properly process Held orders. Additionally, change request 6034 was submitted to remove 120-day exclusion from Held Order code and will be implemented with the July reports published August 15, 2000. The Raw data User Manual will be updated to remove exclusion in the August 15<sup>th</sup> version.”

**Summary of KCL Re-Test Activities:**

KCL reviewed the changes BellSouth made to the August, 2000 calculation instructions for the Provisioning – Mean Held Order Interval and Distribution Intervals metric.

**KCL Re-Test Results:**

KCL found the changes BellSouth made to the August, 2000 calculation instructions to be consistent with the documented calculation method and the stated intent of the Provisioning – Mean Held Order Interval and Distribution Interval metric.

As a result, KCL believes that BellSouth has adequately addressed the issues identified in Exception 105.

**Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 105.**

**Attachments:** None.

Date: February 2, 2001

## **EXCEPTION CLOSURE REPORT**

An exception has been identified as a result of the Pre-Order, Order, & Provisioning xDSL Process Parity Evaluation (PO&P16).

### **Exception:**

**KPMG Consulting LLC (KCL) observes that parity does not appear to exist between the processes through which BellSouth retail (BellSouth Internet Services) and wholesale (CLEC-UNE) customers may determine the availability of ADSL capable loops.**

**CLEC xDSL Pre-Ordering Process Overview:** BellSouth's CLEC (UNE) pre-order xDSL loop qualification process requires CLECs to submit Service Inquiries (SI) by email to the Complex Resale Services Group (CRSG) in Birmingham, Alabama. The SIs are screened and forwarded to the geographically appropriate BellSouth Service Advocacy Center (SAC). A SAC specialist uses LFACS, SOCS, RELOG, and Map Viewer systems to process the SI and determine the availability of the specific xDSL loop (e.g., UDL-2W/ADSL, UDL-2W/HDSL) requested by the CLEC. If the loop is available<sup>1</sup>, the Specialist reserves the cable pair and completes the SI. If the loop is unavailable, the SI is marked "Cannot Provide" or "Not Available but can be provided with a job." Completed SI forms are emailed back to the CRSG and the CLEC is notified of the result. The SI process takes between five to eight days to return a response to the CLEC.

**BellSouth xDSL Pre-Ordering Process Overview:** BellSouth retail operations do not directly provide xDSL services to end user (retail) customers. Rather, BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers. BellSouth.net out sources its pre-order and order processing to Client Logic, a third-party provider of call center services.

Loop qualification information is provided to BellSouth.net retail and resale (e.g., ISP) customers in real-time using the BellSouth Loop Qualification System (LQS or Loopy). LQS contains loop information only on those Telephone Numbers served by Wire Centers in which BellSouth ADSL equipment has been installed and for Carrier Serving

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<sup>1</sup> Per the technical requirements section of the *BellSouth Unbundled Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop - CLEC Information Package*, if an ADSL compatible loop is available, "it will be provided with no Digital Loop Carrier (DLC), load coils or repeaters. These loops will conform to the Revised Resistance Design (RRD) guidelines for non-loaded facilities as described in *Committee T1 Technical Report No. 28*. The loop facility will consist of a loop 18kft or less which may include 6kft of bridge tap with a resistance of 1300 ohms or less if the loop is available... ADSL loops will meet the parameters specified in *BellSouth Technical Reference 73600 (TR73600)*."





Areas (CSAs) in those Wire Centers in which a BellSouth ADSL Remote Solution has been implemented (for loops working from a Digital Loop Carrier remote site). In addition, LQS contains information for BellSouth retail POTS lines only. Customers enter their telephone number into LQS via the BellSouth.net ([www.fastaccess.com](http://www.fastaccess.com)) Web site and receive a response immediately. Client Logic has access to LQS through the FASS system and can immediately determine the availability of ADSL capable loops. LQS also holds details of why a subscriber loop is not qualified.

**BellSouth's Response:**

BellSouth.net provides xDSL service over the high frequency portion of an end user (retail) customer's existing facility. The end user submits its request for BellSouth's ADSL service through BellSouth Internet Service (or through other Network Service Providers/ Internet Service Providers (NSPs/ISPs) such as Telocity.com and Earthlink.com). As stated above, a loop qualification Yes/No response to BellSouth's ADSL Service is provided to the NSP through BellSouth's LQS.

Since LQS became available to NSPs, BellSouth has made it available likewise to DLECs/CLECs ("D/CLEC"). Additionally, D/CLECs have direct access to reason codes in LQS that inform the D/CLEC why a BellSouth facility will not support BellSouth's defined ADSL service. In short, LQS is offered to all D/CLECs and as such puts the NSP and the D/CLEC that will provide xDSL services over the high frequency spectrum of the loop at parity. Information on how CLECs can gain access to LQS will be posted on the Interconnection website on 10/15/00.

The "CLEC xDSL Pre-Ordering Process Overview" pertains only to the purchase of an entire unbundled loop or sub-loop facility rather than applying to the use of the high frequency portion of an existing service facility (meaning, D/CLEC line sharing). D/CLECs who wish to utilize LQS with direct access to the reason codes should contact its account team to initiate the process of amending their interconnection agreement and gaining access to LQS.

As further clarification, prior to ordering an entire unbundled loop or sub-loop facility, the D/CLEC may utilize the features of the LQS to gain a sense of whether BellSouth has determined if whether BellSouth's ADSL service could be provided over the loop that is in service to that address. The D/CLEC may utilize the more limited information with reason codes from LQS as a filter for determining whether its xDSL defined service may be provisioned to that location.

However, because of the nature of the UNE offering and the flexibility that the D/CLEC has when purchasing the loop, the D/CLEC may need to know more about the characteristics of the facilities to the location than is available through LQS. When



ordering a loop to a customer's service location, the D/CLEC may wish to change the nature of the service it intends to provide such that it would not comport to BellSouth's technical standards. Furthermore, the D/CLEC may place any type of equipment it wishes on that D/CLEC owned facility. BellSouth's Mechanized Loop Makeup (Mechanized LMU) Service addresses the needs of D/CLECs for greater information on the characteristics of UNE facilities purchased by D/CLECs. BellSouth previously offered LQS to D/CLECs as an interim solution until the long-term, mandated solution of Mechanized LMU was developed and implemented in the CLEC ordering systems. . Effective September 11th, CLECs gained access to BellSouth's Mechanized LMU wherein the return of LMU data provides the D/CLEC with the underlying loop qualification information in accordance with the FCC's UNE 319 Remand Order. This information enables the D/CLEC to make its own qualification determination based upon the service it wishes to provide.

Mechanized LMU provides a near real-time response, in like fashion to LQS, with much more detailed and current information than LQS. BellSouth's new Mechanized LMU Service is accessible via TAG (TCIF9 only) and LENS. See Carrier Notification SN91081854 for additional information. This offering is currently in beta testing with D/CLECs. Any D/CLEC that desires to participate in the beta test for Mechanized LMU should contact its account team representative. Mechanized LMU will roll out into a full production mode upon successful completion of beta testing. This conversion to a full production mode is expected to occur on 11/18/00.

For specific details, please refer to the:

ENCORE USER REQUIREMENTS FOR EIO SUPPORT OF THE PROCESSING OF  
UNE ADSL, HDSL AND UCL

ENC7694.D0C

DOCUMENT Version 5.0

APRIL 14, 2000

#### **Summary of KCL Re-Test Activities:**

KCL's re-test activities consisted of: 1) an evaluation of BellSouth's response to determine if it adequately addressed the concerns raised by KCL in Exception 107; 2) a review of the documentation referenced in BellSouth's response.

The documents entitled *Encore User Requirement for EIO Support of the Processing of UNE ADSL, HDSL and UCL* and *Encore User Requirements for Mechanization of Loop Make-Up for CLEC XDSLs* describe electronic generation of SIs and the Mechanized Loop Make-Up Process for a CLEC requesting xDSL Loop Make-Up detail respectively. The document "*Loop Qualification System DLEC/CLEC Job Aid, Issue 1, October*



16,2000," was also reviewed and contains information regarding DLEC/CLEC LQS use, availability, installation, and interpreting LQS responses.

**KCL's Re-Test Results:**

As of November 18, 2000, BellSouth made the Loop Qualification System (LQS) available to all DLEC/CLEC customers via the appropriate interconnection agreement amendment, as described in the BellSouth document *LQS DLEC/CLEC Job Aid, Issue 1, October 16, 2000*. According to this document, DLEC/CLEC users can perform on-line queries for up to five manually entered telephone numbers at a time, and up to 2,000 inquiries in a 24-hour period. DLEC/CLEC access to LQS eliminates the lengthy manual process, and provides them with a response from BellSouth regarding a specific loop's availability to support BellSouth's ADSL service.

BellSouth's mechanized LMU service, which was also made available to DLEC/CLECs on November 18, 2000, provides DLEC/CLEC customers with the ability to determine the availability of xDSL capable loops within a timeframe comparable to that of BellSouth retail customers. According to BellSouth documentation, the mechanized LMU allows DLEC/CLECs to submit at least 4,000 loop make-up requests per hour, with an anticipated average response time of two seconds or less. The mechanized LMU service provides DLEC/ CLEC customers with the ability to determine "loop capability," based on published BellSouth technical parameters, for the type of xDSL service they may choose to provide over loops leased from BellSouth. Further information describing the mechanized LMU may be found in the BellSouth document *Encore User Requirements for Mechanization of Loop Make-Up for CLEC xDSLs, ENC7762.doc, Version 2.0*.

The aforementioned access to LQS and the mechanized LMU service makes it possible for DLEC/CLECs to receive loop availability responses and loop make-up information that demonstrates parity with BellSouth Internet Service customers in regards to timeliness of response and completeness of information.

**Based on its re-test activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 107.**

**Attachments:** None.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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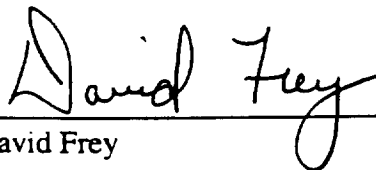
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